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Court Date: <<CmsHearingStart>>

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IRIS Y. MARTINEZ
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2024L010528
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IN THE CIRCUIT COURT OF COOK COUNTY, LAW DIVISION

D.D., D.H., D.D. 2, J.A., K.L., S.S., M.G.,)
R.G., D.S., E.B., C.K., G.D., T.M., A.W.,)
D.B., V.H., A.B., D.H. 2, K.J., M.M., D.P.,)
M.W., D.C., J.W., A.S., C.G., P.A., A.R., C.L.,)
E.G., R.M., P.M., M.B., L.B., J.D., H.E., E.F.,)
S.G., N.H., D.J., J.M., A.M., R.R., I.S., R.S.,)
T.S., J.W. 2, G.W., E.W., and L.S.)

No. 2024L010528

Plaintiffs

vs.

COUNTY OF COOK COUNTY

Respondent

COMPLAINT

Jury Trial Demanded

Plaintiffs D.D., D.H., D.D. 2, J.A., K.L., S.S., M.G., R.G., D.S., E.B., C.K., G.D., T.M., A.W., D.B., V.H., A.B., D.H. 2, K.J., M.M., D.P., M.W., D.C., J.W., A.S., C.G., P.A., A.R., C.L., E.G., R.M., P.M., M.B., L.B., J.D., H.E., E.F., S.G., N.H., D.J., J.M., A.M., R.R., I.S., R.S., T.S., J.W. 2, G.W., E.W., and L.S. (“Plaintiffs”), by and through their attorneys, Bailey Glasser LLP, DiCello Levitt LLP, Levy Konigsberg LLP, and Anapol Weis, bring this action against the County of Cook County, Illinois. Based upon the best information and belief, Plaintiffs allege the following:

NATURE OF THE CLAIM

1. For decades, employees, agents, and servants of the County of Cook County (“Defendant” or “Cook County”) and the State of Illinois vis a vis the Office of the Chief Judge of the Circuit Court of Cook County (“State”) sexually abused Plaintiffs and/or knowingly,

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intentionally, willfully, wantonly, recklessly, and/or negligently allowed or failed to prevent sexual abuse of Plaintiffs while Plaintiffs were children in the legal and physical custody of Cook County and/or the State of Illinois and confined at the Cook County Juvenile Temporary Detention Center (formerly known as the Arthur J. Audy Home and hereinafter referred to as “JTDC”).

2. As a result of chronic mismanagement, patronage, overcrowding, and inadequate supervision, JTDC has been an environment of violence, fear, and sexual abuse for decades.

3. Cook County has had notice of such abuse for decades and nonetheless neglected to protect its confined youth from sexual abuse and failed to implement policies necessary to ensure such protection. It furthermore employed individuals it knew or should have known would sexually abuse juveniles in its care and custody.

4. In 1999, a federal class action lawsuit was filed against Cook County, citing staff-on-youth physical abuse, filthy conditions, understaffing, lack of medical care, overcrowding, and excessive use of room confinement.

5. While JTDC was originally designed to house no more than 500 youth, it regularly housed 600 and as many as 800 youths at one time, resulting in youth incarceration in “overflow” areas such as dayrooms with other youths.

6. The class-action lawsuit resulted in a settlement that required Cook County to improve conditions at the facility. Years later, in August 2007, the federal court presiding over the class action determined that Cook County was not complying with the terms of the settlement agreement and appointed a “Transitional Administrator” (“TA”) to oversee the transition of operations from Cook County to the Office of the Chief Judge of the Circuit Court of Cook County (“OCJ”) in anticipation of legislation mandating as much, and to bring JTDC into compliance with the settlement agreement.

7. To that end, in 2007, the State of Illinois passed Public Act 095-0194, House Bill 236, stripping the Cook County Board of its statutory authority to administer and operate JTDC and transferring the administrative, budgetary, and operational control of JTDC to the Chief Judge of the Circuit Court of Cook County, an arm of the State of Illinois

8. The State of Illinois enacted this legislation as a result of mismanagement, patronage, and years of inhumane conditions at JTDC under Cook County's authority.

9. The law went into effect on January 1, 2008 and mandated that the OCJ appoint a new administrator to serve as superintendent of JTDC within 180 days. In mid-2008, the TA reported that JTDC was understaffed and needed more than 175 additional employees immediately in order to improve detainees' care.

10. Despite knowing that Cook County was failing to improve conditions and that JTDC needed an urgent influx of 175 additional employees to improve detainees' care, and despite the Chief Judge's lawful duty to appoint a new superintendent of JTDC, the Chief Judge neglected to so much as convene a search committee for the new head of JTDC until 2013 and failed to issue an appointment until 2015.

11. The TA worked in close contact and collaboration with the OCJ until May 20, 2015, at which time the Chief Judge's appointment of a new superintendent, an agent of the State of Illinois by and through the OCJ, was formalized. During this interim period, the OCJ and/or Cook County exercised control and retained the right to control the facility in whole or in part.

12. In 2022, a committee convened by the OCJ reported that JTDC is "isolating and deprivational" rather than rehabilitative. Most youths at JTDC spent at least 13 hours per day locked in small cells from, at minimum, 7 p.m. to 7 a.m. Many youths spent several more hours

locked in their room on top of these 13 hours per day as a result of JTDC staff's misuse of room confinement as a form of discipline.

13. The committee stated that "Semantics do not diminish the harsh reality that JTDC youth are locked in their cells for most of the day, every day.... No parent would be allowed to do this to their child." Moreover, the committee concluded that "JTDC does not meet its affirmative duty to rehabilitate youth and help high-risk youth heal through trauma-informed, developmentally appropriate care," and that "[t]he JTDC physical structure is inappropriate and should be replaced with smaller, community-based facilities that have specialized programs."

14. Cook County implemented systematic and unconstitutional strip searches of juvenile inmates at JTDC during intake and throughout juveniles' detention, which was a moving force of certain willful and wanton acts of sexual abuse perpetrated upon Plaintiffs. In addition to violating the Constitution of the United States, these pervasive patterns and practices within JTDC provided the opportunity for the sexual penetration and fondling of minors. While this conduct is criminal and unconstitutional, it is also violative of the administrative regulations governing the Illinois Department of Juvenile Justice, which requires that strip searches be performed by members of the same sex outside the view of others, that they shall be performed only when there is a reasonable suspicion to believe that the youth is carrying contraband in the area searched, and that they shall be performed by medically trained persons under sanitary conditions. 20 Ill. Adm. Code 2602.50(f)(1-4). Notwithstanding these written administrative regulations, the State of Illinois and Cook County perpetrated a policy and practice of strip-searching juveniles in an unlawful manner that caused the willful, wanton, and widespread sexual abuse of juveniles in its custody.

15. A 2023 Illinois Department of Juvenile Justice Inspection Report confirmed that this official practice and policy of unlawful strip-searches at intake continued until as recently as 2023. In addition to being violative of the Constitutions of the United States and the State of Illinois, violative of governing administrative rules and regulations, it was also wholly ineffective in seizing contraband. In fact, between October 1, 2022 and April 30, 2022, JTDC conducted at least 1,203 strip searches and not a single search resulted in finding contraband. In fact, between June 1, 2022 and April 30, 2022, contraband was only found a total of four times, but only through use of the less-invasive wand or pat-down search on all four occasions.

16. The Illinois Department of Juvenile Justice also reported that JTDC staff implemented excessive room confinement of youth and left youth grievances unaddressed in some instances.

17. After passage of the Prison Rape Elimination Act (“PREA”) in 2003, the State of Illinois and Cook County routinely and knowingly failed to implement and ensure compliance with the prophylactic protections and requirements of the PREA, which was designed to eliminate sexual abuse of inmates.

18. This action is brought pursuant to common law and the Childhood Sexual Abuse Act as codified at 735 ILCS 5/13-202.2, and its basis is in tort.

19. This action alleges physical, psychological, and emotional injuries suffered as the result of conduct constituting childhood sexual abuse and sexual abuse as defined in Illinois Compiled Statute 735 ILCS 5/13-202.2 and negligence.

JURISDICTION

20. Plaintiffs invoke the jurisdiction of the State of Illinois and the venue of the Circuit Court of Cook County pursuant to Section 5/2-103 and 5/2-209 of the Illinois Code of Civil

Procedure as the principal office of Cook County, a public or governmental corporation, is located in Cook County and because the tortious acts giving rise to this action occurred in Cook County.

21. The Law Division of the Circuit Court of Cook County has jurisdiction over this action in that each Plaintiff seeks recovery of monetary damages in excess of \$100,000.00 for personal injuries under the Childhood Sexual Abuse Act as codified at 735 ILCS 5/13-202.2

PARTIES

22. Plaintiffs are adults who were resident adolescent citizens of the State of Illinois at the time of the acts described herein and were born on or after July 24, 1983. Plaintiffs bring this action using pseudonyms to shield their identities because they are particularly vulnerable parties as victims of sexual abuse. *See Doe v. Northwestern Memorial Hospital*, 19 N.E.3d 178, 191 (Ill. App. Ct. 2014). Moreover, Plaintiffs' sexual abuse occurred while incarcerated at the Cook County Juvenile Temporary Detention Center, which pursuant to 55 ILCS 75/2 must meet the minimum standards established by the Illinois Department of Juvenile Justice. 705 ILCS 405/1-8, *et seq.*, protects the identity of all juvenile individuals in the juvenile court system, and all such court documents "are sealed and may never be disclosed to the general public or otherwise made widely available." 705 ILCS 405/1-8(a). Moreover, revealing Plaintiffs' identities as victims of childhood sexual abuse would subject Plaintiffs and their families to compounded humiliation, embarrassment, and emotional distress. Accordingly, filed concurrently herewith is a request for Plaintiffs to proceed using fictitious names pursuant to 735 ILCS 5/2-401(e) and to file this initial pleading without identifying information except as otherwise provided herein.

23. Plaintiffs join their claims in this action pursuant to the Illinois Code of Civil Procedure 735 ILCS 5 *et seq.* as Plaintiffs' right to relief arises out of the same transaction or series

of transactions, and this action raises common questions of law or fact among all Plaintiffs against the County of Cook County, Illinois.

24. Plaintiff D.D. is an adult resident citizen of Chicago, Illinois.
25. Plaintiff D.H. is an adult resident citizen of Chicago, Illinois.
26. Plaintiff D.D. 2 is an adult resident citizen of Chicago, Illinois.
27. Plaintiff J.A. is an adult resident citizen of Chicago, Illinois.
28. Plaintiff K.L. is an adult resident citizen of Chicago, Illinois.
29. Plaintiff S.S. is an adult resident citizen of Chicago, Illinois.
30. Plaintiff M.G. is an adult resident citizen of Chicago, Illinois.
31. Plaintiff R.G. is an adult resident citizen of Chicago, Illinois.
32. Plaintiff D.S. is an adult resident citizen of Chicago, Illinois.
33. Plaintiff E.B. is an adult resident citizen of Chicago, Illinois.
34. Plaintiff C.K. is an adult resident citizen of Bellwood, Illinois.
35. Plaintiff G.D. is an adult resident citizen of Chicago, Illinois.
36. Plaintiff T.M. is an adult resident citizen of Chicago, Illinois.
37. Plaintiff A.W. is an adult resident citizen of Chicago, Illinois.
38. Plaintiff D.B. is an adult resident citizen of Chicago, Illinois.
39. Plaintiff V.H. is an adult resident citizen of Chicago, Illinois.
40. Plaintiff A.B. is an adult resident citizen of West Lafayette, Indiana.
41. Plaintiff D.H. 2 is an adult resident citizen of Chicago, Illinois.
42. Plaintiff K.J. is an adult resident citizen of Chicago, Illinois.
43. Plaintiff M.M. is an adult resident citizen of Chicago, Illinois.
44. Plaintiff D.P. is an adult resident citizen of Harvey, Illinois.

45. Plaintiff M.W. is an adult resident citizen of Chicago, Illinois.
46. Plaintiff D.C. is an adult resident citizen of Peoria, Illinois.
47. Plaintiff J.W. is an adult resident citizen of Springfield, Illinois.
48. Plaintiff A.S. is an adult resident citizen of Chicago, Illinois.
49. Plaintiff C.G. is an adult resident citizen of Chicago, Illinois.
50. Plaintiff P.A. is an adult resident citizen of Chicago, Illinois,
51. Plaintiff C.L. is an adult resident citizen of Buford, Georgia.
52. Plaintiff E.G. is an adult resident citizen of La Salle, Illinois.
53. Plaintiff R.M. is an adult resident citizen of Chicago, Illinois.
54. Plaintiff P.M. is an adult resident citizen of Chicago, Illinois.
55. Plaintiff M.B. is an adult resident citizen of Chicago, Illinois.
56. Plaintiff L.B. is an adult resident citizen of Chicago, Illinois.
57. Plaintiff J.D. is an adult resident citizen of Burbank, Illinois.
58. Plaintiff H.E. is an adult resident citizen of Davenport, Illinois.
59. Plaintiff E.F. is an adult resident citizen of Chicago, Illinois.
60. Plaintiff S.G. is an adult resident citizen of Chicago, Illinois.
61. Plaintiff N.H. is an adult resident citizen of Danville, Illinois.
62. Plaintiff D.J. is an adult resident citizen of Chicago, Illinois.
63. Plaintiff J.M. is an adult resident citizen of Mahomet, Illinois.
64. Plaintiff A.M. is an adult resident citizen of Chicago, Illinois.
65. Plaintiff R.R. is an adult resident citizen of Chicago, Illinois.
66. Plaintiff I.S. is an adult resident citizen of Chicago, Illinois.
67. Plaintiff R.S. is an adult resident citizen of Chicago, Illinois.

68. Plaintiff T.S. is an adult resident citizen of Harvey, Illinois.

69. Plaintiff J.W. 2 is an adult resident citizen of Chicago, Illinois.

70. Plaintiff G.W. is an adult resident citizen of Chicago, Illinois.

71. Plaintiff E.W. is an adult resident citizen of San Antonio, Texas.

72. Plaintiff L.S. is an adult resident citizen of Minneapolis, Minnesota.

73. Pursuant to 55 ILCS 5/5-1001, the Defendant is the County of Cook County (hereinafter “Defendant,” “Cook County,” or “County”), a body politic and corporate which has been established in the State of Illinois. By and through the Cook County Board of County Commissioners and or the Cook County Board, the County confined minors, including all Plaintiffs herein, at the Cook County Juvenile Temporary Detention Center (“JTDC”). These entities are charged with the care, custody, and control of the juveniles housed at its facilities as well as the control of its employees, officers, and agents who committed sexual abuse against the Plaintiffs.

FACTUAL ALLEGATIONS

74. Plaintiffs reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

75. Cook County and its employees, agents, and servants perpetrated sexual abuse upon minors in its custody through acts of rape, fondling, digital penetration, fellatio, cunnilingus, and other forms of sexual abuse by Cook County employees and agents.

76. Cook County has caused and permitted a culture of sexual abuse to flourish unabated at JTDC. Upon information and belief, the Cook County Board, the Cook County Board of Commissioners, and the State of Illinois are aware and have for decades been aware that the

conditions identified above as connected to sexual abuse and conditions of JTDC were and are endemic.

77. At all times relevant to the wrongful conduct complained of herein and as to all Counts set forth below, Plaintiffs were children under the age of eighteen years in the legal and physical custody, direct and exclusive control, and supervision of Cook County and its agents, servants, and employees, who were responsible for Plaintiffs' care, safety, and rehabilitation. Additionally or in the alternative, on and after January 1, 2008, certain Plaintiffs were in the legal and physical custody of Cook County and or the State of Illinois by and through the Office of the Chief Judge of the Circuit Court of Cook County, either or both of which had the right to control the agents, servants, and employees, including but not limited to correctional staff, medical staff, probation services and other court staff, Rapid Response Team members, and all other staff at JTDC at all relevant times stated herein.

78. At all relevant times herein, Plaintiffs' abusers were 17 years of age or older and held a position of trust, authority, superiority, influence, and/or supervision in relation to Plaintiffs.

79. The sexual abuse and conduct described herein was perpetrated by employees and agents of Cook County for the purpose of sexual gratification or arousal of the perpetrator(s) and/or the victim. Additionally, or in the alternative, the sexual abuse and conduct described herein on and after January 1, 2008 was perpetrated by employees and agents of the OCJ and/or Cook County for the purpose of sexual gratification or arousal of the perpetrator(s) and/or the victim.

80. At all relevant times and as to each Count set forth below, servants, employees, or other agents of Cook County committed the sexual conduct and abuse identified herein, *infra*, in the course and scope of their employment and/or while upon the premises in possession of Cook County upon which the abusers were privileged to enter only as servants of Cook County.

Additionally or in the alternative, on and after January 1, 2008 servants, employees, or other agents of Cook County and/or the State of Illinois committed the sexual conduct and abuse identified herein, *infra*, in the course and scope of their employment and/or while upon the premises in possession of Cook County and/or the State of Illinois and upon which the abusers were privileged to enter only as servants of Cook County and/or the State of Illinois.

81. At all relevant times and as to each Count set forth below, Cook County knew or had reason to know that it had the ability to control these abusers and knew or should have known of the necessity and opportunity for exercising such control. Additionally, or in the alternative, on and after January 1, 2008, Cook County and/or the State of Illinois knew or had reason to know that it had the ability to control these abusers and knew or should have known of the necessity and opportunity for exercising such control.

82. The sexual abuse and sexual conduct set forth herein lacked consent, and Plaintiffs did not have the capacity to consent by virtue of being, at all relevant times, minors and/or in the legal and physical custody of Cook County and or the State of Illinois. Moreover, the sexual abuse and sexual conduct complained of herein was often accompanied by the use of force, compulsion, undue influence, duress, quid pro quo, coercion, intimidation, and/or threat of physical harm and/or retaliation. Plaintiffs did not factually or legally consent to the abuse described herein. Moreover, Plaintiffs are presumed to have been unable to give knowing consent pursuant to 720 ILCS 5/11-0.1.

Sexual Abuse of D.D.

81. When Plaintiff D.D. was 15 years old and housed at JTDC, a staff member named Mr. House, while acting in the course and scope of employment and under the control of Cook County, sexually abused D.D. in 2004.

82. House was at all relevant times a short, slightly heavy-set black male estimated to be in his 30s. He had long hair and wore glasses. D.D. expects to learn the full name and identity of his abuser through the course of discovery.

83. Mr. House has been accused of sexually abusing multiple victims at JTDC who have filed in the Circuit Court of Cook County.

84. On the second floor of JTDC, D.D. along with other youths lived in lock-down for 23 hours a day with only one hour outside of their respective cells. Approximately two to four weeks into D.D.'s stay at JTDC, House approached D.D. and offered to move him up a level on the facility's behavioral chart to give him extra recreational and day room time, in exchange for sexual favors. Under this coercion, House masturbated D.D. and administered oral copulation on him inside of his cell. House sexually abused D.D. in this manner approximately two to four times a week over the course of four to six weeks. During this period, D.D. spoke to other youths on his housing unit about House's sexually abusive behavior, and several other youths said that they were also being sexually abused by House in the same manner. House threatened to revoke D.D.'s privileges and keep him locked inside of his cell for the rest of his stay if he ever resisted or reported the abuse. He gave D.D. extra time outside of his cell and extra food as incentive to continue suffering the abuse and as a reward for enduring the abuse.

85. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

86. At the relevant times herein, Plaintiff D.D. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

87. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

88. At the time of the above-described sexual abuse of Plaintiff D.D., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

89. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of D.H.

90. When Plaintiff D.H. was between the ages of 13 and 15 and housed at JTDC, a staff member named Mr. House and another staff member (hereinafter "D.H. Abuser 2" unless

otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County, sexually abused D.H. from 2003 to 2005.

91. House was at all relevant times a short black male estimated to be in his 30s or 40s. He wore his hair in dreadlocks.

92. D.H. Abuser 2 was at all relevant times a black male estimated to be in his 30s or 40s and approximately 6'1 in height. He had curly hair.

93. D.H. expects to learn the full names and identities of his abusers through the course of discovery.

94. Over the course of D.H.'s three or four stays at JTDC, House regularly brought D.H. into the bathroom, forcibly undressed him, groped and fondled his genitals, and digitally penetrated him. On some occasions House was joined by D.H. Abuser 2, who participated in groping and digitally penetrating D.H. When D.H. attempted to resist the abuse, House told him "this is my fucking house, you do what I ask you to do or else," then choked and punched D.H., hit him with a broom, and/or squeezed his testicles hard enough to cause severe pain. House also regularly entered the bathroom while D.H. showered to grab and fondle his genitals and buttocks. House sexually abused D.H. in this manner on a near-daily basis over the course of several months-long stays. D.H. Abuser 2 accompanied House in sexually abusing D.H. on a weekly basis. On some occasions House gave D.H. cigarettes and marijuana as a reward for enduring the abuse.

95. During this period of abuse, D.H.'s mother and grandmother visited D.H. at JTDC. D.H. told them about House's sexually abusive behavior, and they urged him to report House to other staff members. D.H. also spoke with other youths who said they were also being sexually abused by House. Together, D.H. and several other youths filed grievances against House, and D.H. verbally reported the abuse to a "white shirt" authority figure. The white shirt said that D.H.

was lying about House and dismissed his report, and no one followed up with D.H. or the other youths about their grievances.

96. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

97. At the relevant times herein, Plaintiff D.H. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

98. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

99. At the time of the above-described sexual abuse of Plaintiff D.H., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

100. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting

Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of D.D. 2

101. When Plaintiff D.D. 2 was 12 and 13 years old and housed at JTDC, a staff member named Mr. Martin, while acting in the course and scope of his employment and under the control of Cook County, sexually abused D.D. 2 in 2005 and 2006.

102. Mr. Martin was at all relevant times a bald black male estimated to be in his late 30s to early 40s and approximately 5'9 in height. He worked the overnight shift. Upon information and belief, Mr. Martin was his last name. D.D. 2 expects to learn the full name and identity of his abuser through the course of discovery.

103. Mr. Martin has been accused of sexually abusing multiple victims at JTDC who have filed in the Circuit Court of Cook County.

104. Starting within the first few days of D.D. 2's stay at JTDC, Mr. Martin gained D.D. 2's trust by making friendly conversation with him and comforting him during evening lock-up. After a few days of this behavior, Mr. Martin entered D.D. 2's cell late at night and said that he would physically harm D.D. 2 and his family unless he provided him with sexual favors. Under these threats, Mr. Martin coerced D.D. 2 into performing oral copulation on him and having sexual intercourse with him inside of his cell. Mr. Martin sexually abused D.D. 2 approximately seven to nine times across multiple stays at JTDC. He gave D.D. 2 extra food and extra time outside of his cell as a reward for keeping quiet about the abuse and incentive to continue to suffer the abuse.

105. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress,

and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

106. At the relevant times herein, Plaintiff D.D. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

107. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

108. At the time of the above-described sexual abuse of Plaintiff D.D. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

109. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of J.A.

110. When Plaintiff J.A. was 16 years old and housed at JTDC, a staff member named Scott, while acting in the course and scope of his employment and under the control of Cook County, sexually abused J.A. in January 2000.

111. Scott was at all relevant times a bald black male estimated to be in his 30s or 40s and approximately 5'11 in height. He wore glasses and worked the overnight shift. Upon information and belief, Scott was either his first or his last name. J.A. expects to learn the full name and identity of his abuser through the course of discovery.

112. After evening lock-up in mid-January of 2000, J.A. banged on his cell door and asked to be taken to the medical unit. Scott approached J.A. and told him to be quiet, so J.A. stopped and went to bed. A short time later, Scott returned to J.A. and asked him if he wanted to go home. J.A. said yes, so Scott pulled down his pants and told J.A. to give him oral sex if he wanted to go home. Scott successfully coerced J.A. into giving him oral sex. After the abuse, Scott said that he would extend J.A.'s stay and ensure that he never went home if he ever reported the abuse. A few days later on January 19, 2000, J.A. was transferred to IYC – St. Charles and he did not see Scott again.

113. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

114. At the relevant times herein, Plaintiff J.A. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

115. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

116. At the time of the above-described sexual abuse of Plaintiff J.A., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

117. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of K.L.

118. When Plaintiff K.L. was 13 years old and housed at JTDC, two staff members (hereinafter "K.L. Abuser 1" and "K.L. Abuser 2," collectively "K.L. Abusers" unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County, sexually abused K.L. in 2005.

119. K.L. Abuser 1 was at all relevant times a bald, heavy-set black male estimated to be in his late 30s to early 40s and approximately 5'10 in height.

120. K.L. Abuser 2 was at all relevant times a heavy-set black male estimated to be in his mid 30s to early 40s and approximately 5'10 in height. He had a short fade haircut.

121. K.L. expects to learn the full names and identities of his abusers through the course of discovery.

122. Within the first few days of K.L.'s stay at JTDC, K.L. Abuser 1 approached K.L. in his cell shortly after his shower and told K.L. about the rules of the facility. During this conversation, K.L. Abuser 2 approached K.L. and asked, "are you listening to him?" K.L. said that he was listening, but K.L. Abuser 2 responded "I don't think he's listening," lunged towards K.L., and physically restrained him on the bed while groping his buttocks. K.L. Abuser 1 then performed oral sex on K.L. while K.L. Abuser 2 held him down. After the abuse, K.L. Abusers threatened him with physical harm and more sexual abuse if he ever reported the incident. K.L. was released from JTDC a few days after this incident and did not see K.L. Abusers again.

123. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

124. At the relevant times herein, Plaintiff K.L. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

125. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse

occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

126. At the time of the above-described sexual abuse of Plaintiff K.L., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

127. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of S.S.

128. When Plaintiff S.S. was 14 years old and housed at JTDC, a staff member (hereinafter "S.S. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused S.S. in 2007.

129. S.S. Abuser 1 was at all relevant times a stocky black male estimated to be in his 30s and approximately 6'0 or 6'1 in height. He had a short fade haircut. S.S. expects to learn the full name and identity of his abuser through the course of discovery.

130. A few weeks into S.S.'s stay at JTDC, S.S. Abuser 1 approached S.S. in his cell shortly after evening lock-up and threatened S.S. with physical harm unless he provided him with sexual favors. S.S. froze out of fear, and S.S. Abuser 1 forcibly removed S.S.'s pants and performed oral copulation on him. Afterwards, S.S. Abuser 1 again threatened S.S. with physical harm if he ever disclosed the abuse and left his cell. S.S. was released from JTDC a few weeks after this incident and did not see S.S. Abuser 1 again.

131. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

132. At the relevant times herein, Plaintiff S.S. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

133. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

134. At the time of the above-described sexual abuse of Plaintiff S.S., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate

staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

135. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of M.G.

136. When Plaintiff M.G. was 15 years old and housed at JTDC, two staff members (hereinafter "M.G. Abuser 1" and "M.G. Abuser 2," collectively "M.G. Abusers" unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County, sexually abused M.G. in 1998.

137. M.G. Abuser 1 was at all relevant times a short, heavy-set black male estimated to be in his 30s. He had a low fade haircut.

138. M.G. Abuser 2 was at all relevant times a bald, stocky black male estimated to be in his 30s and approximately 5'11 in height.

139. M.G. expects to learn the full names and identities of his abusers through the course of discovery.

140. A few weeks into M.G.'s stay at JTDC, M.G. Abusers approached M.G. in his cell and told him to follow them under the guise of a doctor's appointment. M.G., who had not requested a doctor's appointment but feared getting in trouble with the staff members, did as he was told and followed M.G. Abusers into an isolated room within his housing unit. Once there, M.G. Abuser 1 told M.G. to pull down his pants, and M.G. complied under the impression that the

doctor would enter shortly. M.G. Abuser 1 then grabbed and fondled M.G.'s bare genitals while M.G. Abuser 2 watched. M.G. asked what he was doing, and M.G. Abuser 1 responded “don't you want to go home? You can go home after this” then attempted to put his mouth on M.G.'s genitals. M.G. pulled away from him, but M.G. Abuser 1 continued to fondle M.G.'s genitals for another 30 to 60 seconds. M.G. Abusers then escorted M.G. back to his cell and said “someone else is gonna come see you later.”

141. That evening, M.G. reported M.G. Abusers' sexually abusive behavior to a male “white shirt” authority figure, but he told M.G. to be quiet and go back into his cell. The next day, M.G. was placed on parole and released from JTDC. He immediately reported the incident with M.G. Abusers to his mother, and she called JTDC multiple times in an attempt to further report the sexual abuse. No one at JTDC followed up with M.G. or his mother regarding their reports.

142. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

143. At the relevant times herein, Plaintiff M.G. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

144. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external

mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

145. At the time of the above-described sexual abuse of Plaintiff M.G., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

146. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of R.G.

147. When Plaintiff R.G. was 14 or 15 years old and housed at JTDC, a staff member (hereinafter "R.G. Abuser 1" unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County, sexually abused R.G. in 1999 or 2000.

148. R.G. Abuser 1 was at all relevant times a white female estimated to be in her mid 20s to early 30s and of average height. She worked the evening shift. R.G. expects to learn the full name and identity of his abuser through the course of discovery.

149. Starting within the first few days of his stay at JTDC, R.G. Abuser 1 regularly stopped by R.G.'s cell after evening lock-up to give him extra snacks and make friendly conversation. After a few days of this behavior, R.G. Abuser 1 started to grope R.G.'s genitals over his boxers while making sexual comments. After a few more days, R.G. Abuser 1 offered

R.G. outside food and extra privileges in exchange for sexual favors. R.G. capitulated to this coercion, and R.G. Abuser 1 administered oral sex on him, coerced him into administering oral sex on her, and had sexual intercourse with him. R.G. Abuser 1 sexually abused R.G. in this manner five to ten times in all. R.G. Abuser 1 told R.G. that he was “old enough to know what needs to happen here” and said that he would lose his privileges and never see his parents again if anyone ever learned of the abuse. She said that he shouldn’t even bother telling anyone because “they’ll believe me over you” and he’ll be the one who gets in trouble. She gave him outside food and soda as a reward for enduring the abuse.

150. Shortly after R.G. was released from JTDC, his mother received a call from JTDC staff who said that R.G. had tested positive for a sexually transmitted disease (“STD”) during his routine release physical. R.G. was not sexually active before the incidents of abuse with R.G. Abuser 1. He was prescribed a medication to treat the STD, and he is still affected by the STD as an adult.

151. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

152. At the relevant times herein, Plaintiff R.G. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

153. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached

various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

154. At the time of the above-described sexual abuse of Plaintiff R.G., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

155. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of D.S.

156. When Plaintiff D.S. was 16 and 17 years old and housed at JTDC, two staff members (hereinafter "D.S. Abuser 1" and "D.S. Abuser 2" unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County, sexually abused D.S. in 2009.

157. D.S. Abuser 1 was at all relevant times a black female of medium build and approximately 5'8 or 5'9 in height. She had short hair.

158. Within the first few weeks of D.S.'s stay at JTDC, D.S. Abuser 1 approached him as he exited the shower, groped his genitals over his towel, and made a sexual comment about his

genitals, all in front of one or two other nearby youths. Throughout the rest of his stay at JTDC, D.S. Abuser 1 regularly groped his genitals over the clothes and made sexual comments about his body, genitals, and her perceptions of his sexual prowess. She often described in explicit detail how she wished to perform sexual acts with D.S. once he was released. She frequently gave him extra food, extra time outside of her cell, and extra phone time as a reward for enduring the abuse, and often threatened to revoke all his privileges and extend his sentence if he ever reported her sexually abusive behavior.

159. D.S. Abuser 2 was at all relevant times a tall black female of medium build and of medium complexion.

160. On D.S.'s 17th birthday, staff members put him inside an empty cell while they prepared his transport to the Cook County Jail. While inside this cell, D.S. Abuser 2 entered and offered to give him a "birthday gift" before he left the facility. She brought D.S. to a nearby bathroom where she masturbated him and coerced him into giving her oral sex. D.S. was transferred out of JTDC a few hours later and did not see D.S. Abuser 2 again.

161. D.S. expects to learn the full names and identities of his abusers through the course of discovery.

162. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

163. At the relevant times herein, Plaintiff D.S. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

164. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

165. At the time of the above-described sexual abuse of Plaintiff D.S., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

166. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of E.B.

167. When Plaintiff E.B. was 13 years old and housed at JTDC, a staff member named Jones, while acting in the course and scope of his employment and under the control of Cook County, sexually abused E.B. in 2003 or 2004.

168. Jones was at all relevant times a short, bald, black male estimated to be in his 30s or 40s. He had a goatee and, upon information and belief, served as a Chicago police officer before

working at JTDC. E.B. expects to learn the full name and identity of his abuser through the course of discovery.

169. E.B. regularly played checkers with the other juvenile inmates on his housing unit. A few weeks into his stay at JTDC, Jones approached E.B. and gained E.B.'s trust by playing checkers with him after evening lock-up. Jones rewarded E.B. with gifts such as pizza, extra time outside of his cell, and a radio when he beat Jones at checkers. After a few weeks of this behavior, Jones approached E.B. when he was in the bathroom by himself and offered him a PlayStation or Xbox in exchange for sexual favors. Jones said that he had this "arrangement" with several other youths, and that he rewarded his victims handsomely for enduring the sexual abuse. E.B. refused, so Jones forcibly grabbed E.B.'s genitals and began to masturbate him. E.B. pushed his hand away and ran away from the bathroom. Jones revoked the gifts and privileges he had previously granted E.B. as a punishment for refusing his advances.

170. After this incident, Jones regularly groped and fondled E.B.'s buttocks and genitals in passing throughout the facility, such as in line the cafeteria and in the hallways of the housing unit. Jones sexually abused E.B. in this manner several times a week over the course of a month. During the period of abuse, E.B. told another staff member that he was being sexually abused by another staff member, though he did not disclose the name of his abuser. The staff member said he would try to get E.B. moved off of his housing unit, but neither he nor anyone else at JTDC followed up with E.B. regarding his report.

171. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

172. At the relevant times herein, Plaintiff E.B. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

173. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

174. At the time of the above-described sexual abuse of Plaintiff E.B., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

175. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of C.K.

176. When Plaintiff C.K. was between the ages of 15 and 17 and housed at JTDC, three staff members (hereinafter "C.K. Abuser 1," "C.K. Abuser 2," and "C.K. Abuser 3," collectively

“C.K. Abusers” unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County, sexually abused C.K. from 1999 to 2001.

177. C.K. Abuser 1 was at all relevant times a heavy-set dark-skinned black male estimated to be in his mid 30s and of average height.

178. C.K. Abuser 2 was at all relevant times a black male estimated to be in his 20s.

179. C.K. Abuser 3 was at all relevant times a black male estimated to be in his 20s or 30s.

180. C.K. Abusers all worked the overnight shift. C.K. expects to learn the full names and identities of his abusers through the course of discovery.

181. Throughout C.K.’s three short stays at JTDC, C.K. Abusers individually entered C.K.’s cell after evening lock-up, physically pinned him to his bed, and forcibly masturbated him. When he attempted to fight back against the abuse, C.K. Abusers alternately choked him, threatened to kill him, and threatened to extend his sentence unless he stopped resisting. C.K. Abusers collectively sexually abused C.K. approximately ten times across his three stays at JTDC, separately from each other but in a similar manner.

182. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

183. At the relevant times herein, Plaintiff C.K. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

184. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

185. At the time of the above-described sexual abuse of Plaintiff C.K., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

186. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of G.D.

187. When Plaintiff G.D. was 12 or 13 years old and housed at JTDC, a staff member named Mr. Dent, while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis the Office of the Chief Judge of the Circuit Court of Cook County, sexually abused G.D. in 2007 or 2008.

188. Mr. Dent was at all relevant times a bald, dark-skinned black male of muscular build estimated to be in his late 30s to early 40s and approximately 5'6 to 5'7 in height. G.D. expects to learn the full name and identity of his abuser through the course of discovery.

189. During evening lock-up, G.D. and a few other youths banged on their cell doors to express their frustration with the conditions of JTDC. Mr. Dent entered G.D.'s cell, grabbed him by the neck, forcefully pushed him backwards onto his bed, and told him to "be quiet before I hit you in the nuts." Mr. Dent then grabbed and squeezed G.D.'s genitals over the clothes, hard enough to cause severe pain, then exited G.D.'s cell and slammed his door closed.

190. The next morning, G.D. verbally reported Mr. Dent's sexually abusive behavior to a "white shirt" authority figure named Mr. Lopez. Mr. Lopez told G.D. that he would look into the incident and get back to him, but he nor anyone else at JTDC followed up with G.D. regarding his report. G.D. also spoke to his friend and fellow inmate (whose name G.D. recalls but intentionally withholds at this time) about Mr. Dent, and his fellow inmate said that Mr. Dent was also sexually abusing him. This fellow inmate later died in JTDC custody in 2012.

191. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

192. At the relevant times herein, Plaintiff G.D. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

193. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred,

and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

194. At the time of the above-described sexual abuse of Plaintiff G.D., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

195. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of T.M.

196. When Plaintiff T.M. was 16 years old and housed at JTDC, two staff members (hereinafter "T.M. Abuser 1" and "T.M. Abuser 2," unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County, sexually abused T.M. in 2003.

197. T.M. Abuser 1 was at all relevant times a heavy-set black male estimated to be in his late 30s to early 40s and approximately 5'8 or 5'9 in height. He had an afro and worked on unit 4E.

198. Starting within the first few weeks of T.M.'s first stay at JTDC in July of 2003, T.M. Abuser 1 regularly watched T.M. while he showered and made sexual comments about his body and genitals. After these showers and as T.M. dressed himself, T.M. Abuser 1 groped T.M.'s genitals and buttocks and asked to see his genitals up close. On one occasion, T.M. Abuser 1 asked T.M. if he wanted to take another shower "just with you and me." T.M. refused, so T.M. Abuser 1 sent him to confinement inside of his cell as punishment. T.M. Abuser 1 sexually abused T.M. in this manner approximately two to three times a week for one to two months.

199. T.M. Abuser 2 was at all relevant times a tall, dark-skinned black male estimated to be in his early 30s. He had dreadlocks and worked on unit 4K.

200. T.M. expects to learn the full identity of his abusers during the course of discovery.

201. Starting within the first few weeks of T.M.'s second stay at JTDC in late 2003, T.M. Abuser 2 regularly watched T.M. while he showered and made sexual comments about his body. During and after the showers, T.M. Abuser 2 regularly groped T.M.'s genitals and smacked him on the buttocks. On some occasions, T.M. Abuser 2 visited T.M.'s cell during evening lock-up to grope his genitals and buttocks while making sexual comments. When T.M. attempted to resist the abuse, T.M. Abuser 2 told him to "shut the fuck up" and threatened to send him to confinement. T.M. Abuser 2 sexually abused T.M. in this manner approximately two to three times a week for approximately one month.

202. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

203. At the relevant times herein, Plaintiff T.M. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

204. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

205. At the time of the above-described sexual abuse of Plaintiff T.M., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

206. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of A.W.

207. When Plaintiff A.W. was 15 years old and housed at JTDC, two staff members named Ms. Williams and Mr. Coleman, while acting in the course and scope of their employment and under the control of Cook County, sexually abused A.W. in 2001.

208. Ms. Williams was at all relevant times a tall, heavy-set black female estimated to be in her 40s. She wore glasses, often had her hair in braids, and regularly smoked cigarettes.

209. Starting within the first few days of A.W.'s stay at JTDC, Ms. Williams gained A.W.'s trust by bringing him extra food and asking him about his personal life. After approximately two weeks of this behavior, Ms. Williams entered A.W.'s cell a few hours after evening lock-up and threatened to extend his stay at JTDC and keep him locked inside his cell for the rest of his stay unless he gave her sexual favors. Ms. Williams coerced A.W. into kissing her neck and breasts, digitally penetrating her, and masturbating himself while she watched. Ms. Williams sexually abused A.W. in this manner approximately four times a week over the course of seven to eight months. She sexually abused A.W. late at night after lock-up and in the mornings before the end of her shift. She often told A.W. that she would make his life "a living hell" if he ever reported the abuse. She gave him cigarettes and extra food as a reward for keeping quiet about the abuse.

210. Mr. Coleman was at all relevant times a muscular black male estimated to be in his late 50s and of average height. He was regularly and noticeably drunk during his shifts.

211. Starting soon after Ms. Williams began abusing A.W., Mr. Coleman entered A.W.'s cell in the evening after lock-up, punched him in the chest, and kicked him repeatedly as he lay on the ground. Mr. Coleman then forced A.W. to stand up, pulled A.W.'s pants down, and threatened him with more physical harm unless he provided him with sexual favors. Mr. Coleman physically intimidated A.W. into masturbating himself while Mr. Coleman watched and made demeaning

sexual comments. Mr. Coleman sexually abused A.W. in this manner approximately two to three times a week over the course of seven to eight months. He regularly slapped, punched, and kicked A.W. and threatened to hurt him even more if he ever reported the abuse.

212. A.W. expects to learn the full names and identities of his abusers through the course of discovery.

213. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

214. At the relevant times herein, Plaintiff A.W. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

215. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

216. At the time of the above-described sexual abuse of Plaintiff A.W., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate

staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

217. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of D.B.

218. When Plaintiff D.B. was approximately 13 years old and housed at JTDC, a staff member (hereinafter "D.B. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused D.B. in approximately 2001.

219. D.B. Abuser 1 was at all relevant times a slightly heavy-set black male estimated to be in his 40s and approximately 5'10 to 6'0 in height. He was going bald and occasionally wore glasses. D.B. expects to learn the full name and identity of his abuser through the course of discovery.

220. During D.B.'s intake process, D.B. Abuser 1 ordered D.B. to undress and fondled his genitals for several minutes while making sexual comments. He did not wear gloves during this incident.

221. A few days later in the mid-day, D.B. Abuser 1 approached D.B. in his cell and offered him advice about his upcoming court date. He then said that he had to strip search D.B. and ordered him to undress. D.B., though confused as to why he was being strip searched, did as he was told and undressed. D.B. Abuser 1 then masturbated D.B.'s genitals and digitally penetrated

him under the guise of a strip search. He did not wear gloves during this incident. Once D.B. Abuser 1 finished the “strip search,” he forcefully pinned D.B. against the wall of the cell and forcibly administered oral copulation on him. D.B. attempted to resist the abuse, but D.B. Abuser 1 was much bigger and able to physically restrain D.B. during the incident of abuse. D.B. Abuser 1 sexually abused D.B. in this manner one more time after this incident. D.B. was released from JTDC one to two weeks after the abuse started and did not see D.B. Abuser 1 again.

222. This “strip search” was conducted upon D.B. without individualized, reasonable suspicion, nor compliance with the constitutions of the United States and the State of Illinois, nor the administrative rules governing strip searches. This search was nothing more than a pretext for sexual abuse.

223. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

224. At the relevant times herein, Plaintiff D.B. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

225. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for

reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

226. At the time of the above-described sexual abuse of Plaintiff D.B., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

227. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of V.H.

228. When Plaintiff V.H. was approximately 15 years old and housed at JTDC, an intake staff member (hereinafter "V.H. Abuser 1" unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County, sexually abused V.H. in 2005.

229. V.H. Abuser 1 was at all relevant times a slightly heavy-set black female estimated to be in her late 30s to early 40s and of average height. V.H. expects to learn the full name and identity of her abuser through the course of discovery.

230. During V.H.'s intake process, V.H. Abuser 1 and another female staff member brought her into the intake room and ordered her to undress and give them her undergarments. V.H. did as she was told, and V.H. Abuser 1 inspected her bra and underwear closely. Once

finished, she ordered V.H. to squat and cough, then groped and fondled V.H.'s breasts for approximately 20 to 30 seconds. V.H., who was very flat-chested at the time, was uncomfortable with V.H. Abuser 1's fondling but feared getting in trouble if she spoke up. V.H. Abuser 1 ordered V.H. to squat and cough again, then rubbed her ungloved hand against V.H.'s bare genitals for approximately ten seconds. V.H. left the next day and did not see V.H. Abuser 1 again.

231. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

232. At the relevant times herein, Plaintiff V.H. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

233. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

234. At the time of the above-described sexual abuse of Plaintiff V.H., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate

staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

235. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of A.B.

236. When Plaintiff A.B. was 16 years old and housed at JTDC, a staff member (hereinafter "A.B. Abuser 1" unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused A.B. in 2019.

237. A.B. Abuser 1 was at all relevant times a Hispanic female, estimated to be in her early 30s and approximately 5'9" in height. She had long black hair and light brown eyes. A.B. expects to learn the full name and identity of his abuser through the course of discovery.

238. On at least five occasions, A.B. Abuser 1 sexually abused A.B. in A.B.'s cell. A.B. Abuser 1 would begin sexually abusing A.B. by hugging and kissing him. A.B. Abuser 1 would then masturbate A.B.'s penis. A.B. Abuser 1 would show photographs of her vagina to A.B., and she would lift her shirt to expose her bare breasts to A.B.

239. On at least one occasion, A.B. Abuser 1 forced A.B. to engage in sexual intercourse with her by forcing A.B. to penetrate her vagina with his penis.

240. A.B. Abuser 1 bribed A.B. for his silence by giving him outside food and snacks, lotion, clothes, and anything else he would ask for.

241. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

242. At the relevant times herein, Plaintiff A.B. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

243. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

244. At the time of the above-described sexual abuse of Plaintiff A.B., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

245. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for

the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of D.H. 2

246. When Plaintiff D.H. 2 was 15 years old and housed at JTDC, a guard named Ms. Alexander, while acting in the course and scope of her employment and under the control of Cook County and/or the State of Illinois via a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused D.H. 2 in 2013.

247. Ms. Alexander was at all relevant times a black female, estimated to be in her mid-30s and approximately 5'8" in height. She had short black hair, and she wore different colored wigs. She had brown eyes, and she had tattoos behind her ear. D.H. 2 expects to learn the full name and identity of his abuser through the course of discovery.

248. On at least fifteen occasions, Ms. Alexander sexually abused D.H. 2 in D.H. 2's cell. Ms. Alexander first began grooming D.H. 2 by flirting with D.H. 2, writing D.H. 2 notes, and allowing D.H. 2 to stay up late. While alone in D.H. 2's cell, Ms. Alexander would masturbate D.H. 2's penis and perform oral copulation on him until D.H. 2 ejaculated. D.H. 2 would ejaculate on the floor or in his hands, and he would clean up with a towel. Ms. Alexander forced D.H. 2 to digitally penetrate her vagina and grope her breasts and buttocks.

249. Ms. Alexander bribed D.H. 2 for his silence by providing him with extra food, snacks, and commissary privileges.

250. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

251. At the relevant times herein, Plaintiff D.H. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

252. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

253. At the time of the above-described sexual abuse of Plaintiff D.H. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

254. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of K.J.

255. When Plaintiff K.J. was 15 to 16 years old and housed at JTDC, a guard named Ms. Hampton, while acting in the course and scope of her employment and under the control of Cook

County and/or the State of Illinois via a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused K.J. in 2008.

256. Ms. Hampton was at all relevant times a black female, estimated to be in her mid-30s and weighing approximately 200 pounds. She wore her hair in different hairstyles and colors, and she had brown eyes. K.J. expects to learn the full name and identity of his abuser through the course of discovery.

257. During K.J.'s five month stay at JTDC, Ms. Hampton sexually abused K.J. approximately two times per week in K.J.'s cell in the 4-Unit. Ms. Hampton would allow K.J. to put up a sheet on his cell door to have more privacy when he was alone. Ms. Hampton would force K.J. to masturbate himself in front of her. Ms. Hampton would masturbate K.J. with her bare hand and perform oral copulation on him. Each instance of sexual abuse lasted approximately fifteen to twenty-five minutes.

258. Ms. Hampton bribed K.J. for his silence by providing him with extra phone time and outside food.

259. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

260. At the relevant times herein, Plaintiff K.J. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

261. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred,

and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

262. At the time of the above-described sexual abuse of Plaintiff K.J., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

263. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of M.M.

264. When Plaintiff M.M. was 17 years old and housed at JTDC, Officer Stuart and another detention officer (hereinafter "M.M. Abuser 2" unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused M.M. in 2008.

265. Officer Stuart was at all relevant times a black male, estimated to be in his early 30s and approximately 6'0" in height. He had black hair and brown eyes, and he weighed approximately 200 pounds.

266. M.M. Abuser 2 was at all relevant times a black male, estimated to be in his mid-30s and approximately 5'11" in height. He had black hair and brown eyes, and he weighed approximately 220 pounds.

267. M.M. expects to learn the full name and identity of his abusers through the course of discovery.

268. On at least five occasions, Officer Stuart sexually abused M.M. in the restroom and in M.M.'s cell. Officer Stuart would masturbate M.M.'s penis with his bare hand and perform oral copulation on him. Each instance of sexual abuse lasted approximately five minutes.

269. On at least two occasions, M.M. Abuser 2 sexually abused M.M. in M.M.'s cell. M.M. Abuser 2 would enter M.M.'s cell when M.M. was alone. M.M. Abuser 2 would masturbate M.M.'s penis with his bare hand. Each instance of sexual abuse lasted approximately fifteen minutes.

270. M.M. Abuser 2 threatened to send M.M. into solitary confinement if he did not allow M.M. Abuser 2 to sexually abuse him.

271. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

272. At the relevant times herein, Plaintiff M.M. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

273. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

274. At the time of the above-described sexual abuse of Plaintiff M.M., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

275. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of D.P.

276. When Plaintiff D.P. was 15 years old and housed at JTDC, Mr. Fullilove and another staff member (hereinafter "D.P. Abuser 2" unless otherwise indicated), while acting in the

course and scope of their employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused D.P. in 2008.

277. Mr. Fullilove was at all relevant times a black male, estimated to be in his 30s to 40s and approximately 6'0" in height. He was bald and had dark brown eyes.

278. Mr. Fullilove has been accused of sexually abusing multiple victims at JTDC.

279. D.P. Abuser 2 was at all relevant times a black male, estimated to be in his 20s to 30s and approximately 5'7" to 5'9" in height.

280. D.P. expects to learn the full name and identity of her abusers through the course of discovery.

281. On at least seven occasions, Mr. Fullilove sexually abused D.P. in D.P.'s cell and in the shower room. Mr. Fullilove would force D.P. to perform oral copulation on him until he ejaculated into her mouth. Mr. Fullilove would grope D.P.'s breasts and buttocks with his bare hands, and he would digitally penetrate D.P.'s vagina with his bare hand.

282. On at least one occasion, D.P. Abuser 2 sexually abused D.P. in D.P.'s cell, taking D.P.'s virginity. D.P. Abuser 2 entered D.P.'s cell and unbuttoned his pants. D.P. Abuser 2 forced D.P. to perform oral copulation on him. D.P. Abuser 2 then forced D.P. to lay on her back while he penetrated her vagina with his penis. D.P. Abuser 2 ejaculated onto D.P.'s stomach. D.P. began bleeding from her vagina as she had never engaged in sexual intercourse before.

283. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

284. At the relevant times herein, Plaintiff D.P. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

285. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

286. At the time of the above-described sexual abuse of Plaintiff D.P., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

287. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of M.W.

288. When Plaintiff M.W. was 16 years old and housed at JTDC, correctional officers (hereinafter "M.W. Abuser 1" and "M.W. Abuser 2" – collectively "M.W. Abusers" – unless

otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused M.W. in 2011.

289. M.W. Abuser 1 was at all relevant times a black male, estimated to be in his 30s to 40s and approximately 6'0" in height. He had brown eyes, and he weighed approximately 200 pounds.

290. M.W. Abuser 2 was at all relevant times a female, estimated to be in her mid to late 30s and approximately 5'4" in height. She had short blonde hair, and she weighed approximately 200 pounds.

291. M.W. expects to learn the full name and identity of his abusers through the course of discovery.

292. On at least one occasion, M.W. Abuser 1 sexually abused M.W. during the intake process. M.W. Abuser 1 masturbated M.W.'s penis with his bare hand until M.W. stopped him. M.W. Abuser then groped M.W.'s buttocks with his bare hand. When M.W. tried to stop M.W. Abuser 1, M.W. Abuser 1 said, "Shut the fuck up. It's my house."

293. On at least two occasions, M.W. Abuser 2 sexually abused M.W. in the bathroom during the afternoon. M.W. Abuser 2 would force M.W. to remove his clothing before she would begin massaging M.W.'s buttocks. M.W. Abuser 1 would then force M.W. to masturbate himself in front of her for approximately two to three minutes until he ejaculated. M.W. Abuser 1 also masturbated M.W.'s penis until he ejaculated. M.W. Abuser 2 told M.W. not to tell anyone about the sexual abuse.

294. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress,

and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

295. At the relevant times herein, Plaintiff M.W. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

296. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

297. At the time of the above-described sexual abuse of Plaintiff M.W., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

298. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of D.C.

299. When Plaintiff D.C. was 13 years old and housed at JTDC, a staff member known as Mr. G, while acting in the course and scope of his employment and under the control of Cook County, sexually abused D.C. in 2002.

300. Mr. G was at all relevant times a stocky, muscular black male estimated to be approximately 5'10 in height. He had short hair. D.C. expects to learn the full name and identity of his abuser through the course of discovery.

301. Starting within the first few days of D.C.'s stay at JTDC, Mr. G regularly approached D.C. throughout the facility, such as during recreational time, in the cafeteria, or on his housing unit, and brought him to various isolated hallways and empty rooms. There, Mr. G forcefully pushed D.C. against the wall and groped his genitals and buttocks over the clothes for an extended period, upwards of 90 seconds, under the guise of a pat-down search. D.C. never attempted to smuggle contraband into the facility and had very few disciplinary infractions against him during his stay at JTDC, but he did not resist this abuse out of fear of getting in more trouble. Mr. G sexually abused D.C. in this manner approximately three to four times over the course of three months. After each search, D.C. attempted to verbally report Mr. G's sexually abusive behavior to other staff members, and each time D.C. was told to "forget about it" and to stop trying to report the incidents.

302. These "searches" were conducted upon D.C. without individualized, reasonable suspicion, nor compliance with the constitutions of the United States and the State of Illinois, nor the administrative rules governing strip searches. These searches were nothing more than a pretext for sexual abuse.

303. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress,

and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

304. At the relevant times herein, Plaintiff D.C. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

305. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

306. At the time of the above-described sexual abuse of Plaintiff D.C., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

307. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of J.W.

308. When Plaintiff J.W. was 15 years old and housed at JTDC, a coach named Ms. Rosie, while acting in the course and scope of their employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused J.W. in early 2011.

309. Ms. Rosie was at all relevant times a tall, heavy-set white female estimated to be in her early 30s. She had brown hair and oversaw the “rec” room at JTDC. J.W. expects to learn the full name and identity of his abuser through the course of discovery.

310. Approximately three months into J.W.’s stay at JTDC, Ms. Rosie approached J.W. as he entered the rec room, blocked his path inside, and grabbed and fondled his genitals over the clothes while smiling at him. J.W. was uncomfortable with her sexual advances and pushed his way past her. Ms. Rosie sexually abused J.W. in this manner two more times after this incident until J.W. was released from JTDC.

311. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

312. At the relevant times herein, Plaintiff J.W. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

313. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to

warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

314. At the time of the above-described sexual abuse of Plaintiff J.W., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

315. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of A.S.

316. When Plaintiff A.S. was 17 years old and housed at JTDC, a teacher (hereinafter "A.S. Abuser 1" unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused A.S. in the spring of 2018.

317. A.S. Abuser 1 was at all relevant times a white male estimated to be in his late 20s to mid 30s and approximately 5'7 in height. He had a short, thick beard. A.S. expects to learn the full name and identity of her abuser through the course of discovery.

318. A.S. attended classes taught by A.S. Abuser 1, and she often required additional help on schoolwork. During these classes, A.S. Abuser 1 sat next to A.S. as she worked and fondled

A.S.'s breasts and genitals over her clothes, making sure to conceal his groping behind the desk so the other students wouldn't be able to see. He also regularly "flirted" with A.S. and made sexual comments towards her during class. A.S. Abuser 1 sexually abused A.S. in this manner approximately two to three times a week for two to three weeks until A.S. was released from JTDC.

319. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

320. At the relevant times herein, Plaintiff A.S. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

321. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

322. At the time of the above-described sexual abuse of Plaintiff A.S., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

323. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of C.G.

324. When Plaintiff C.G. was 15 years old and housed at JTDC, a staff member named Mr. James, while acting in the course and scope of his employment and under the control of Cook County, sexually abused C.G. in 2005.

325. Mr. James was at all relevant times a stocky black male estimated to be in his late 40s to mid 50s and approximately 6'1 or 6'2 in height. He wore glasses and a blue uniform shirt. C.G. expects to learn the full name and identity of his abuser through the course of discovery.

326. A few months into C.G.'s stay at JTDC, C.G. got into a physical fight and was placed on confinement inside of his cell. C.G. propped up his mattress against one of the cell walls so he could use the bathroom in privacy, but Mr. James approached C.G. as he used the bathroom and told him to take the mattress down. C.G. was upset about his lack of privacy and yelled at Mr. James, so Mr. James rushed into the cell, forcefully pinned C.G. to the ground, stuck his hands down C.G.'s pants, and squeezed his genitals hard enough to cause severe pain. Mr. James threatened C.G. with more abuse unless he kept quiet, then left the cell.

327. When Mr. James left the cell, C.G. spoke with other youths in the cells around him (inmates could hear each other through the glass of the cells) about how Mr. James had grabbed and squeezed his genitals. A few hours later, Mr. James entered C.G.'s cell with outside food and said he would give it to C.G. if he stopped talking about the incident of abuse.

328. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

329. At the relevant times herein, Plaintiff C.G. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

330. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

331. At the time of the above-described sexual abuse of Plaintiff C.G., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

332. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for

the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of P.A.

333. When Plaintiff P.A. was 16 years old and housed at JTDC, a staff member (hereinafter “P.A. Abuser 1” unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused P.A. in 2008.

334. P.A. Abuser 1 was at all relevant times a muscular black male estimated to be in his early to late 30s and approximately 5’11 to 6’1 in height. He had a short fade haircut and tattoos on his arms. P.A. expects to learn the full name and identity of his abuser through the course of discovery.

335. During P.A.’s intake process, P.A. Abuser 1 ordered P.A. to undress for a strip search. During this strip search, P.A. Abuser 1 grabbed and rubbed P.A.’s bare genitals for an extended period, approximately 10 to 20 seconds. P.A. was uncomfortable and asked P.A. Abuser 1 to stop. P.A. Abuser 1 responded that he would place P.A. on confinement and extend his sentence if he resisted the abuse. P.A. Abuser 1 continued to fondle P.A.’s genitals for another few seconds. P.A. did not see P.A. Abuser 1 again after this incident.

336. This “strip search” was conducted upon P.A. without individualized, reasonable suspicion, nor compliance with the constitutions of the United States and the State of Illinois, nor the administrative rules governing strip searches. This search was nothing more than a pretext for sexual abuse.

337. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress,

and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

338. At the relevant times herein, Plaintiff P.A. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

339. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

340. At the time of the above-described sexual abuse of Plaintiff P.A., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

341. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of A.R.

342. When Plaintiff A.R. was approximately 15 years old and housed at JTDC, a staff member (hereinafter “A.R. Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused A.R. in approximately 2002.

343. A.R. Abuser 1 was at all relevant times a slim black male estimated to be in his 30s and approximately 5’10 in height. He had curly hair and a full beard. A.R. expects to learn the full name and identity of his abuser through the course of discovery.

344. Within the first few days of A.R.’s stay at JTDC, A.R. Abuser 1 approached A.R. in his cell after evening lock-up and ordered him to undress for a strip search. A.R. objected to this, but A.R. Abuser 1 said that he had to make sure A.R. didn’t have any contraband on him and again ordered him to undress. A.R., who had never attempted to smuggle any contraband into the facility, feared to resist A.R. Abuser 1 and did as he was told. A.R. Abuser 1 caressed A.R.’s arms, neck, back, and thighs, grabbed and squeezed his genitals for an extended period (approximately 30 to 90 seconds), and rubbed his anus. A.R. Abuser 1 sexually abused A.R. in this manner two to three times a week for the duration of A.R.’s stay, which was approximately three weeks.

345. These “strip searches” were conducted upon A.R. without individualized, reasonable suspicion, nor compliance with the constitutions of the United States and the State of Illinois, nor the administrative rules governing strip searches. These searches was nothing more than a pretext for sexual abuse.

346. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

347. At the relevant times herein, Plaintiff A.R. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

348. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

349. At the time of the above-described sexual abuse of Plaintiff A.R., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

350. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of C.L.

351. When Plaintiff C.L. was 15 years old and housed at JTDC, a correctional officer named Brown, while acting in the course and scope of their employment and under the control of

Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused C.L. in the winter of 2008.

352. Brown was at all relevant times a muscular black male estimated to be in his mid 30s and upwards of 6'0 tall. He was bald and had a goatee. C.L. expects to learn the full name and identity of his abuser through the course of discovery.

353. Within the first few days of C.L.'s stay at JTDC, Brown told C.L. that he had to search him every time he left the housing unit. C.L. was hesitant as no other youths had to be searched in this manner, and none of the other staff members tried to search C.L., but he feared that resistance would constitute a violation of facility rules. Brown then forcefully pushed C.L. against the wall and patted him down over the clothes, during which time he grabbed, groped, and fondled C.L.'s genitals. C.L. was uncomfortable but was under the impression that this was normal procedure. Brown sexually abused C.L. in this manner upwards of two times total over the course of C.L.'s stay at JTDC, which was approximately two weeks. He offered C.L. outside food as an incentive to keep quiet about the abuse.

354. These "searches" were conducted upon C.L. without individualized, reasonable suspicion, nor compliance with the constitutions of the United States and the State of Illinois, nor the administrative rules governing strip searches. These searches was nothing more than a pretext for sexual abuse.

355. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

356. At the relevant times herein, Plaintiff C.L. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

357. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

358. At the time of the above-described sexual abuse of Plaintiff C.L., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

359. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of E.G.

360. When Plaintiff E.G. was 15 years old and housed at JTDC, a staff member (hereinafter "E.G. Abuser 1" unless otherwise indicated), while acting in the course and scope of

their employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused E.G. in 2013.

361. E.G. Abuser 1 was at all relevant times a heavy-set black male estimated to be in his mid 30s and approximately 5'8 in height. He had short hair and slight facial hair. E.G. expects to learn the full name and identity of her abuser through the course of discovery.

362. Within the first one to two days of E.G.'s stay at JTDC, E.G. Abuser 1 said that he would falsely write E.G. up and not allow her to leave her cell or the housing unit unless she allowed him to grope her, then grabbed and groped her buttocks over the clothes. E.G. was afraid of E.G. Abuser 1 and attempted to avoid him by staying inside of her cell, which caused E.G. Abuser 1 to approach her inside of her cell to make sexual comments towards her and fondle her buttocks. E.G. Abuser 1 sexually abused E.G. in this manner approximately five to seven times over the course of E.G.'s stay at JTDC, which was approximately two to four weeks. He brought her extra food as an incentive to keep quiet about the abuse.

363. During this period, E.G. verbally reported E.G. Abuser 1's sexually abusive behavior to another staff member. This staff member claimed that E.G. was lying and refused to officially take down her report. No one at JTDC followed up with E.G. regarding her report.

364. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

365. At the relevant times herein, Plaintiff E.G. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

366. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

367. At the time of the above-described sexual abuse of Plaintiff E.G., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

368. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of R.M.

369. When Plaintiff R.M. was 11 and 12 years old and housed at JTDC, intake staff members, while acting in the course and scope of his employment and under the control of Cook County, sexually abused R.M. in 2006 and 2007.

370. R.M. had three short-term stays at JTDC approximately in 2006 and 2007. At the start of each of these three stays during intake, a male staff member sexually abused R.M. under

the pretext of a strip search while one to two other male staff members watched. The male staff member performing the “strip search” was different during each stay. During the abuse, the male staff member ordered R.M. to undress, groped her bare breasts, and ordered her to bend over and cough while he rubbed his hand against her vagina and anus. The staff members claimed without any particularized or reasonable suspicion that they had to search R.M. to ensure that she was not hiding drugs or car keys on her person.

371. These “strip searches” were conducted upon R.M. without individualized, reasonable suspicion, nor compliance with the constitutions of the United States and the State of Illinois, nor the administrative rules governing strip searches. These searches were nothing more than a pretext for sexual abuse.

372. R.M. expects to learn the full names and identities of her abusers through the course of discovery.

373. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

374. At the relevant times herein, Plaintiff R.M. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

375. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the

abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

376. At the time of the above-described sexual abuse of Plaintiff R.M., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

377. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of P.M.

378. When Plaintiff P.M. was 15 and 16 years old and housed at JTDC, a staff member named Mr. Walker, while acting in the course and scope of his employment and under the control of Cook County, sexually abused P.M. from 2002 to 2004.

379. Mr. Walker was at all relevant times a short, dark-skinned black male estimated to be in his 30s. He had short hair and worked on housing unit 5F. P.M. expects to learn the full name and identity of his abuser through the course of discovery.

380. Starting during one of P.M.'s first stays at JTDC in 2002, Walker regularly brought P.M. into the bathroom and ordered him to undress under the guise of a strip search. During these "strip searches," Mr. Walker grabbed and groped P.M.'s bare genitals.

381. These “searches” were conducted upon P.M. without individualized, reasonable suspicion, nor compliance with the constitutions of the United States and the State of Illinois, nor the administrative rules governing strip searches. These searches were nothing more than a pretext for sexual abuse.

382. After a few weeks of these strip searches, Walker approached P.M. in his cell, gave him outside food, and asked him to come into the bathroom so they could talk in private. P.M. initially refused and said they could talk inside of his cell, but Walker insisted that he wanted to talk to P.M. away from the cameras. P.M. capitulated and Walker lured him into the bathrooms, where he ordered P.M. to undress and threatened to revoke P.M.’s privileges by moving him down a behavioral level unless he gave him sexual favors. Under this threat, Walker masturbated P.M. inside of the bathroom. After this incident, Walker sexually abused P.M. in this manner two to five times a week over the course of P.M.’s several stays at JTDC, collectively about one year. On some occasions, Walker asked P.M. to masturbate him but P.M. refused, so Walker placed P.M. on confinement and revoked his privileges as punishment. He gave P.M. outside food and cigarettes.

383. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

384. At the relevant times herein, Plaintiff P.M. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

385. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

386. At the time of the above-described sexual abuse of Plaintiff P.M., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

387. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of M.B.

388. When Plaintiff M.B. was 12 years old and housed at JTDC, a youth supervisor named Mr. Young, while acting in the course and scope of his employment and under the control of Cook County, sexually abused M.B. in 1996.

389. Mr. Young was at all relevant times slim, dark-skinned black male estimated to be in his late 40s to early 50s and approximately 6'0 in height. He had an afro. M.B. expects to learn the full name and identity of his abuser through the course of discovery.

390. Mr. Young has been accused of sexually abusing multiple other victims at JTDC.

391. Mr. Young approached M.B. in the television room and falsely accused him of talking too loudly, even though M.B. was not talking. Mr. Young ordered him to stand against the wall, then grabbed M.B.'s head and pushed it against the wall. He then grabbed M.B.'s genitals over the clothes and pulled on them forcefully, hard enough to cause severe pain. He threatened M.B. with further sexual violence if he did not behave, then ordered him back to his cell. M.B. did not have any significant interactions with Mr. Young after this incident.

392. The next morning, M.B. verbally reported Mr. Young's sexually abusive behavior to another staff member. This staff member dismissed his report and said that he was lying. No one at JTDC followed up with M.B. regarding his report.

393. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

394. At the relevant times herein, Plaintiff M.B. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

395. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached

various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

396. At the time of the above-described sexual abuse of Plaintiff M.B., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

397. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of L.B.

398. When Plaintiff L.B. was 16 years old and housed at JTDC, a staff member (hereinafter "L.B. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused L.B. in 2002.

399. L.B. Abuser 1 was at all relevant times a black male, estimated to be in his 30s and approximately 6'2" in height. He had short hair and tattoos on his arms. L.B. expects to learn the full name and identity of his abuser through the course of discovery.

400. On at least two occasions, L.B. Abuser 1 sexually abused L.B. in the supply closet. While L.B. was in the supply closet alone, L.B. Abuser 1 entered the supply closet and forced L.B.

to perform oral copulation on him. On at least one occasion, L.B. Abuser 1 digitally penetrated L.B.'s anus. Each instance of sexual abuse lasted approximately fifteen to twenty minutes.

401. L.B. Abuser 1 bribed L.B. for his silence by providing L.B. with extra food, extra phone time, and extra recreational time.

402. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

403. At the relevant times herein, Plaintiff L.B. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

404. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

405. At the time of the above-described sexual abuse of Plaintiff L.B., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

406. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.D.

407. When Plaintiff J.D. was 12 years old and housed at JTDC, a staff member (hereinafter "J.D. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused J.D. in 1999.

408. J.D. Abuser 1 was at all relevant times a black male, estimated to be in his late 20s to early 30s and approximately 6'0" in height. He was bald, and he had dark eyes. J.D. expects to learn the full name and identity of his abuser through the course of discovery.

409. On at least one occasion, J.D. Abuser 1 sexually abused J.D. in J.D.'s cell at night. J.D. was sleeping on his stomach in his bed when J.D. Abuser 1 entered his cell. J.D. Abuser 1 got on top of J.D.'s back, shoved J.D.'s face into the pillow where J.D. could not breathe, and dug his elbow into J.D.'s back. J.D. Abuser 1 stated, "I like your blonde hair you little bitch." J.D. Abuser 1 then penetrated J.D.'s anus with his penis until he ejaculated. While penetrating J.D.'s anus, J.D. Abuser 1 continued calling J.D. a "little blonde bitch" while spitting on him. This instance of sexual abuse lasted approximately ten minutes.

410. J.D. Abuser 1 threatened to extend J.D.'s time at the facility and to bring friends with him next time if J.D. ever told anyone about the sexual abuse.

411. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

412. At the relevant times herein, Plaintiff J.D. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

413. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

414. At the time of the above-described sexual abuse of Plaintiff J.D., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

415. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting

Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of H.E.

416. When Plaintiff H.E. was 16 years old and housed at JTDC, a staff member named Officer Mixon, while acting in the course and scope of his employment and under the control of Cook County, sexually abused H.E. in 2001.

417. Officer Mixon was at all relevant times a black male, estimated to be in his 30s and approximately 6'0" in height. He was bald, and he had a goatee. He had tattoos on his arms and chest. H.E. expects to learn the full name and identity of his abuser through the course of discovery.

418. On at least fifteen occasions, Officer Mixon sexually abused H.E. in H.E.'s cell at night. Officer Mixon would enter H.E.'s cell and begin making small talk. Officer Mixon would then expose his penis and force H.E. to masturbate his penis until he ejaculated. Officer Mixon would remove H.E.'s pants and masturbate H.E.'s penis. Each instance of sexual abuse lasted approximately five to ten minutes.

419. Officer Mixon bribed H.E. for his silence by offering H.E. extra snacks, food and phone time.

420. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and

Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

421. At the relevant times herein, Plaintiff H.E. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

422. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

423. At the time of the above-described sexual abuse of Plaintiff H.E., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

424. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to

make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of E.F.

425. When Plaintiff E.F. was 12 years old and housed at JTDC, a staff member (hereinafter “E.F. Abuser 1” unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County, sexually abused E.F. in 2002.

426. E.F. Abuser 1 was at all relevant times a black female, estimated to be in her 30s to 40s and approximately 5’7” to 5’8” in height. She had black hair and brownish black eyes. E.F. expects to learn the full name and identity of his abuser through the course of discovery.

427. On at least one occasion, E.F. Abuser 1 sexually abused E.F. in E.F.’s cell. E.F. had gotten into an argument with another juvenile inmate, and the other juvenile inmate told E.F. Abuser 1 to “suck his d*ck.” E.F. Abuser 1 believed E.F. made this comment, so she took E.F. back to his cell. While in E.F.’s cell, E.F. Abuser 1 said “You’re telling people to suck your d*ck, but your d*ck isn’t hard.” E.F. Abuser 1 then grabbed E.F.’s penis and masturbated his penis.

428. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

429. At the relevant times herein, Plaintiff E.F. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

430. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred,

and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

431. At the time of the above-described sexual abuse of Plaintiff E.F., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

432. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of S.G.

433. When Plaintiff S.G. was 15 years old and housed at JTDC, a correctional officer (hereinafter "S.G. Abuser 1" unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County, sexually abused S.G. in 2006.

434. S.G. Abuser 1 was at all relevant times a black female, estimated to be in her 30s and approximately 5'11" in height. She wore a blonde laced wig, and she had brown hair. She was known to change her wig hairstyles. S.G. expects to learn the full name and identity of her abuser through the course of discovery.

435. On at least five occasions, S.G. Abuser 1 sexually abused S.G. in S.G.'s cell and in the bathroom. S.G. Abuser 1 would force S.G. and other inmates to fight for extra food. When S.G. won the fights, S.G. Abuser 1 would digitally penetrate S.G.'s vagina with her bare hand.

436. S.G. Abuser 1 threatened to add another year to S.G.'s sentence and to withhold food and water if S.G. ever told anyone about the sexual abuse.

437. S.G. reported the sexual abuse to a doctor at the facility, but nothing happened from her report.

438. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

439. At the relevant times herein, Plaintiff S.G. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

440. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the

abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

441. At the time of the above-described sexual abuse of Plaintiff S.G., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

442. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of N.H.

443. When Plaintiff N.H. was 16 years old and housed at JTDC, a guard (hereinafter "N.H. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused N.H. in 2002.

444. N.H. Abuser 1 was at all relevant times a white male, estimated to be in his 40s and approximately 5'8" to 5'9" in height. He had short dark brown hair and brown eyes. N.H. expects to learn the full name and identity of her abuser through the course of discovery.

445. On at least one occasion, N.H. Abuser 1 sexually abused N.H. N.H. Abuser 1 forced N.H. to perform oral copulation on him until he ejaculated. N.H. Abuser 1 continuously grabbed N.H.'s hair while making derogatory comments towards N.H. while sexually abusing her. This instance of sexual abuse lasted approximately five minutes.

446. N.H. Abuser 1 threatened to have other guards physically abuse N.H. if N.H. ever told anyone about the sexual abuse.

447. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

448. At the relevant times herein, Plaintiff N.H. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

449. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

450. At the time of the above-described sexual abuse of Plaintiff N.H., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff

members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

451. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of D.J.

452. When Plaintiff D.J. was 13 years old and housed at JTDC, a librarian (hereinafter "D.J. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused D.J. in 2004.

453. D.J. Abuser 1 was at all relevant times a Hispanic male, estimated to be in his mid-30s and approximately 5'6" in height. He had brown and gray hair. D.J. expects to learn the full name and identity of his abuser through the course of discovery.

454. During D.J.'s 8th grade graduation rehearsal, D.J. Abuser 1 sexually abused D.J. in the north bathroom. D.J. Abuser 1 took D.J. into the north bathroom and pulled down D.J.'s pants. D.J. Abuser 1 masturbated D.J.'s penis with his bare hand. D.J. punched D.J. Abuser 1 to stop the sexual abuse and to escape.

455. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and

Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

456. At the relevant times herein, Plaintiff D.J. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

457. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

458. At the time of the above-described sexual abuse of Plaintiff D.J., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

459. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to

make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.M.

460. When Plaintiff J.M. was 15 years old and housed at JTDC, a correctional officer (hereinafter “J.M. Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused J.M. in 2001.

461. J.M. Abuser 1 was at all relevant times a black male, estimated to be in his 30s and approximately 6’0” in height. He had black hair with a low fade haircut and dark brown eyes. J.M. expects to learn the full name and identity of her abuser through the course of discovery.

462. On at least two occasions, J.M. Abuser 1 sexually abused J.M. in J.M.’s cell. J.M. Abuser began grooming J.M. by telling J.M. she was pretty and by making flirtatious comments. While alone in J.M.’s cell, J.M. Abuser 1 pulled down J.M.’s pants, bent J.M. over the lower bunk bed, and held his hand over her mouth telling J.M. to be quiet. J.M. Abuser 1 would then penetrate J.M.’s vagina with his penis until he ejaculated. After J.M. Abuser 1 ejaculated, he would instruct J.M. to put her clothes back on. Each instance of sexual abuse lasted approximately five minutes.

463. J.M. Abuser 1 threatened to extend J.M.’s sentence if J.M. ever told anyone about the sexual abuse. J.M. Abuser 1 also threatened J.M. with physical violence if J.M. ever told anyone about the sexual abuse.

464. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

465. At the relevant times herein, Plaintiff J.M. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

466. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

467. At the time of the above-described sexual abuse of Plaintiff J.M., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

468. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of A.M.

469. When Plaintiff A.M. was 15 or 16 years old and housed at JTDC, a correctional officer (hereinafter “A.M. Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused A.M. in 2000.

470. A.M. Abuser 1 was at all relevant times a black male, estimated to be in his late 30s and under 6’0” tall. He had short black and gray hair, and he had a goatee. A.M. expects to learn the full name and identity of his abuser through the course of discovery.

471. On at least one occasion, A.M. Abuser 1 sexually abused A.M. in the bathroom. Another staff member physically abused A.M. in the bathroom when A.M. Abuser 1 entered the bathroom to stop. Once alone, A.M. Abuser 1 masturbated A.M.’s penis until A.M. ejaculated. This instance of sexual abuse lasted approximately ten minutes.

472. A.M. Abuser 1 threatened physical violence to A.M. and A.M.’s family if A.M. ever told anyone about the sexual abuse.

473. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

474. At the relevant times herein, Plaintiff A.M. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

475. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached

various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

476. At the time of the above-described sexual abuse of Plaintiff A.M., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

477. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of R.R.

478. When Plaintiff R.R. was 12 to 13 years old and housed at JTDC, a guard named Mr. Richard, while acting in the course and scope of his employment and under the control of Cook County, sexually abused R.R. in 1999.

479. Mr. Richard was at all relevant times a black male, estimated to be in his mid-20s and approximately 6'3" to 6'4" in height. He had black hair with an afro hairstyle and brown eyes.

He was also known as “Mr. Rick” to other inmates. R.R. expects to learn the full name and identity of his abuser through the course of discovery.

480. On at least three occasions, Mr. Richard sexually abused R.R. in the shower area in the evenings. While R.R. would get ready to take a shower, Mr. Richard would slap R.R.’s buttocks and grope R.R.’s penis with his bare hand.

481. On at least one occasion, Mr. Richard made R.R. stay in his cell for two days after sexually abusing R.R. to ensure R.R. would not tell anyone about the sexual abuse. R.R. tried telling other staff members at the facility about the sexual abuse, but nobody believed him.

482. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

483. At the relevant times herein, Plaintiff R.R. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

484. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

485. At the time of the above-described sexual abuse of Plaintiff R.R., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

486. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of I.S.

487. When Plaintiff I.S. was 16 years old and housed at JTDC, a staff member (hereinafter "I.S. Abuser 1" unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County, sexually abused I.S. in 2006.

488. I.S. Abuser 1 was at all relevant times a black male, estimated to be in his 30s and approximately 6'2" in height. He had short black hair and brown eyes, and he typically wore a hat. I.S. expects to learn the full name and identity of his abuser through the course of discovery.

489. On at least one occasion, I.S. Abuser 1 sexually abused I.S. in the shower area. I.S. Abuser 1 entered the shower stall when I.S. was nude and showering alone. I.S. Abuser 1 forced I.S. to put his arms against the shower wall. I.S. Abuser 1 digitally penetrated I.S.'s anus.

490. On at least one occasion, I.S. Abuser 1 sexually abused I.S. in the hallway. I.S. Abuser 1 approached I.S. in the hallway and forced I.S. to remove all his clothing. I.S. Abuser 1 then digitally penetrated I.S.'s anus.

491. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

492. At the relevant times herein, Plaintiff I.S. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

493. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

494. At the time of the above-described sexual abuse of Plaintiff I.S., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

495. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of R.S.

496. When Plaintiff R.S. was 16 years old and housed at JTDC, a staff member (hereinafter "R.S. Abuser 1" unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County, sexually abused R.S. in 2006.

497. R.S. Abuser 1 was at all relevant times a white male, estimated to be in his 30s and approximately 5'9" in height. He had short brownish black hair and blue eyes, and he had a goatee. R.S. expects to learn the full name and identity of his abuser through the course of discovery.

498. On at least three occasions, R.S. Abuser 1 sexually abused R.S. in the television area. R.S. Abuser 1 began grooming R.S. by complimenting R.S. and promising to take R.S. to baseball games after his time at the facility. R.S. Abuser 1 would put his bare hand down R.S.'s pants and masturbate R.S.'s penis. R.S. Abuser 1 tried to force R.S. to masturbate his penis. Each instance of sexual abuse lasted approximately three minutes.

499. R.S. Abuser 1 bribed R.S. for his silence by providing R.S. with outside food regularly.

500. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

501. At the relevant times herein, Plaintiff R.S. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

502. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

503. At the time of the above-described sexual abuse of Plaintiff R.S., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

504. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County

employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of T.S.

505. When Plaintiff T.S. was 13 years old and housed at JTDC, staff members named Officer Bryce and Officer Morgan, while acting in the course and scope of their employment and under the control of Cook County, sexually abused T.S. in 1997.

506. Officer Bryce was at all relevant times a black male, estimated to be in his late 30s and approximately 6'0" in height. He had black hair and brown eyes, and he had tattoos.

507. Officer Morgan was at all relevant times a black male, estimated to be in his 40s and approximately 5'9" in height. He had long curly hair and dark brown eyes.

508. T.S. expects to learn the full name and identity of his abusers through the course of discovery.

509. On multiple occasions, Officer Bryce sexually abused T.S. and other juvenile inmates. Officer Bryce would force T.S. to perform sexual acts on the other juvenile inmates.

510. On multiple occasions, Officer Bryce sexually abused T.S. in T.S.'s cell by pulling out T.S.'s penis and masturbate T.S.'s penis. Officer Bryce also groped T.S.'s buttocks and anus. Officer Bryce forced T.S. to perform oral copulation on him. These instances of sexual abuse lasted approximately twenty minutes.

511. Officer Bryce bribed T.S. for his silence by providing T.S. with cigarettes and marijuana.

512. On multiple occasions, Officer Morgan forced T.S. to perform oral copulation on other juvenile inmates.

513. On multiple occasions, Officer Morgan sexually abused T.S. in T.S.'s cell and in the shower area. Officer Morgan forced T.S. to perform oral copulation on him until he ejaculated. Officer Morgan digitally penetrated T.S.'s anus. Officer Morgan forced T.S. to digitally penetrate his anus. These instances of sexual abuse lasted approximately 30 to 45 minutes.

514. Officer Morgan bribed T.S. for his silence by providing T.S. with cigarettes and marijuana.

515. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

516. At the relevant times herein, Plaintiff T.S. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

517. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

518. At the time of the above-described sexual abuse of Plaintiff T.S., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

519. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.W. 2

520. When Plaintiff J.W. 2 was 16 to 17 years old and housed at JTDC, correctional officers named Cassandra and Mr. Smith, while acting in the course and scope of their employment and under the control of Cook County, sexually abused J.W. 2 in 2001.

521. Cassandra was at all relevant times a white female, estimated to be in her 20s and approximately 5'5" in height. She wore her hair in braids, and she often wore lipstick.

522. Mr. Smith was at all relevant times a white male, estimated to be in his 30s to 40s and approximately 6'0" in height. He had short blonde hair, and he had a tattoo.

523. J.W. 2 expects to learn the full name and identity of his abusers through the course of discovery.

524. On at least five occasions, Cassandra sexually abused J.W. 2 in the dayroom and in J.W. 2's cell. Cassandra would pull J.W. 2's pants down and masturbate J.W. 2's penis with her bare hand. Cassandra would perform oral copulation on J.W. 2 until he ejaculated. Cassandra forced J.W. 2 to touch her vagina and breasts.

525. Cassandra threatened to have other inmates physically harm J.W. 2 if J.W. 2 told anyone about the sexual abuse.

526. On at least four occasions, Mr. Smith sexually abused J.W. 2 in the bathroom and in the hallway. Mr. Smith would pin J.W. 2 to the wall and reach into J.W. 2's pants. Mr. Smith would masturbate J.W. 2's penis and grope J.W. 2's buttocks.

527. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

528. At the relevant times herein, Plaintiff J.W. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

529. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

530. At the time of the above-described sexual abuse of Plaintiff J.W. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

531. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of G.W.

532. When Plaintiff G.W. was 16 years old and housed at JTDC, a guard named Officer Arrora, while acting in the course and scope of his employment and under the control of Cook County, sexually abused G.W. in 2004.

533. Officer Arrora was at all relevant times a Hispanic male, estimated to be in his 20s to 30s and approximately 6'0" in height. He was bald and had dark eyes. He wore glasses and had tattoos on his arms. G.W. expects to learn the full name and identity of his abuser through the course of discovery.

534. On at least ten occasions, Officer Arrora sexually abused G.W. in G.W.'s cell and in the bathroom. Officer Arrora masturbated G.W.'s penis with his bare hand and performed oral

copulation on him. Officer Arrora digitally penetrated G.W.'s anus. Officer Arrora penetrated G.W.'s anus with his penis. G.W. would ejaculate on Officer Arrora's face, in Officer Arrora's hand, or on the floor. Officer Arrora also forced G.W. to masturbate his penis until he ejaculated.

535. G.W. reported the sexual abuse at the facility. When Officer Arrora found out about the report, Officer Arrora and the other staff members threatened G.W. with an extended sentence and solitary confinement.

536. Officer Arrora bribed G.W. for his silence by allowing G.W. to stay up late and providing G.W. with extra food. Officer Arrora also bribed G.W. for his silence by providing him with re-rolled marijuana joints. On G.W.'s birthday, Officer Arrora gifted G.W. a bottle of Bacardi Gold alcohol.

537. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

538. At the relevant times herein, Plaintiff G.W. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

539. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the

abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

540. At the time of the above-described sexual abuse of Plaintiff G.W., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

541. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of E.W.

542. When Plaintiff E.W. was 15 years old and housed at JTDC, two correctional officers (hereinafter "E.W. Abuser 1" and "E.W. Abuser 2"- collectively "E.W. Abusers" – unless otherwise indicated) and correctional Officer Jackson, while acting in the course and scope of their employment and under the control of Cook County, sexually abused E.W. in 2001.

543. E.W. Abuser 1 was at all relevant times a black male, estimated to be in his 20s to 30s and approximately 6'0" in height. He was bald and had a black mustache. He had brown eyes and wore glasses.

544. E.W. Abuser 2 was at all relevant times a male, estimated to be in his 30s to 40s and approximately 5'8" in height. He had black curly hair, a black goatee with mustache, and brown eyes.

545. E.W. expects to learn the full name and identity of his abusers through the course of discovery.

546. During E.W.'s 90-day stay at JTDC, E.W. Abusers sexually abused E.W. almost every other night in E.W.'s cell. E.W. Abusers rotated each night and sexually abused E.W. individually. E.W. Abusers penetrated E.W.'s anus with their penises until ejaculation. E.W. Abusers did not use condoms when sexually abusing E.W.

547. E.W. Abusers threatened to have other inmates beat E.W. to death if E.W. ever told anyone about the sexual abuse. E.W. reported the sexual abuse to another staff member, but the staff member told E.W. to "shut up" and did not listen.

548. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

549. At the relevant times herein, Plaintiff E.W. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

550. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn

Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

551. At the time of the above-described sexual abuse of Plaintiff E.W., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

552. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of L.S.

553. When Claimant L.S. was 14 years old and housed at JTDC, an officer named Ms. Cook, who was at all relevant times an employee of and under the control of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused L.S. in 2002.

554. Ms. Cook was at all relevant times a black female, estimated to be in her 30s to 40s and approximately 5'11" to 6'0" in height. She had dark brown eyes and wore short, blonde and

dark brown wigs. Ms. Cook had a gap in her teeth. L.S. expects to learn the full name and identity of her abuser through the course of discovery.

555. On at least one occasion, Ms. Cook sexually abused L.S. in the bathroom. After another juvenile inmate at L.S.'s table in the dining room argued with Ms. Cook, Ms. Cook instructed L.S. and three other juvenile inmates to go into the bathroom. Ms. Cook said she would teach the juvenile inmates a lesson. Ms. Cook ordered L.S. and the other juvenile inmates to remove their clothing and bend over. Ms. Cook began hitting and shoving L.S. and the other juvenile inmates. Ms. Cook digitally penetrated L.S.'s vagina and anus with a toilet plunger handle for approximately five minutes. L.S. suffered from bleeding due to the penetration.

556. After sexually abusing L.S. and the other juvenile inmates, Ms. Cook provided them with clean clothes and maxi pads to soak up the bleeding.

557. Ms. Cook told L.S. and the other juvenile inmates not to tell anyone about the sexual abuse.

558. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

559. At the relevant times herein, Plaintiff L.S. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

560. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached

various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

561. At the time of the above-described sexual abuse of Plaintiff L.S., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

562. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

CAUSES OF ACTION

COUNT I – *Negligence/Negligence per se*

563. Plaintiffs reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

564. Cook County, as well as its employees, agents, and officers, were required by law to take or otherwise voluntarily took the custody of minors, including Plaintiffs herein, within its

jurisdiction such as to deprive them of their normal opportunities for protection. The Plaintiffs and Cook County, and its employees and agents stood in such a special relationship to one another that the law imposes on the State an obligation of reasonable conduct for the benefit of the Plaintiffs, including but not limited to an affirmative duty to aid and/or protect against and prevent an unreasonable risk of physical harm from third parties, including its own agents or employees.

565. As such, Cook County and its officers, agents, and employees, owed various duties to those juveniles, including Plaintiffs, in its custody. They include, but are not limited to: (1) a duty to provide individualized assessments to rehabilitate and prevent further delinquent behavior through the development of educational, vocational, social, emotional and basic life skills which enable youth to grow and mature; (2) a duty to secure care and guidance as will serve the safety and moral, emotional, mental, and physical welfare of the minor; (3) a duty to control the individuals who are the source of the sexual abuse alleged herein; (4) a duty to provide the minor with food, shelter, education, and medical care; (5) a duty to not permit an act of sexual abuse when the person has knowledge of sexual abuse; (6) a duty, when having reason to believe that sexual abuse has or will occur, to make timely and reasonable efforts to stop the sexual abuse by reporting the sexual abuse, or causing a report to be made, to medical or law enforcement authorities and the Illinois Department of Children and Family Services; (7) a duty to act as a reasonable, prudent State of Illinois employee, agent, or officer would act under the circumstances to ensure the prevention and reporting of sexual abuse; (8) a duty to provide confined youth with multiple avenues to report sexual abuse, including an avenue outside the facility, so that even if the abuser is someone directly supervising that inmate or higher up in the authority chain, or a staff person or inmate who might retaliate against that inmate, the victim still has a safe way to report the abuse, thus ensuring both increased reporting, deterrence, and prevention of abuse; (9) a duty

to provide confined youth with access to emotional support services from outside the facility to help confined youth heal from trauma; (10) a duty to protect them against an unreasonable risk of physical and/or psychological harm, including sexual abuse; (11) a duty to protect children; (12) a duty to rehabilitate youth through developing the competencies of the youth in its care, including but not limited to the enhancement and development of educational, vocational, social, emotional, and basic life skills; (13) a duty to actively participate in the continuity of care of the juvenile justice system; (14) a duty to actively engage in positive youth development; (15) a duty to secure for each minor in its custody such care and guidance as will serve the safety and moral, emotional, mental, and physical welfare of the minor and the best interests of the community; and (16) a duty to preserve and strengthen the minor's family ties whenever possible.

566. These duties are non-exhaustive and non-delegable. Given the special relationship of custodian and ward between Cook County and Plaintiffs herein, Cook County is directly liable and vicariously liable in whole or in part for the acts, omissions, and tortious conduct, whether negligent and/or intentional, of its employees and agents.

567. Sexual abuse of children at JTDC was persistent and prevalent, and the nature of their confinement and seclusion from family, as well as prior reports of abuse, rendered the risk of sexual abuse to be foreseeable and imminent. Cook County and its officers, agents, and employees knew or should have known that it had numerous agents, officers, and employees who sexually abused children at JTDC.

568. Cook County and its officers, agents, and employees breached each of the foregoing duties, among others.

569. In so doing, Cook County and its officers, agents, and employees violated one or more statutes or ordinances that provide for a punishment and caused the kind of harm the statutes

or ordinances were intended to prevent. The Plaintiffs were a member of the class the statutes or ordinances were intended to protect.

570. Cook County failed to use ordinary care in determining whether JTDC was safe and/or determining whether it had sufficient information to represent their facilities and/or programs as safe. Cook County's breach of various duties include, but are not limited to: failure to protect Plaintiffs from a known/suspected danger, failure to supervise staff members and Plaintiffs, failure to implement minimally sufficient policies and procedures in place to prevent sex abuse, failure to take reasonable measures to ensure that policies and procedures to prevent sex abuse were working, failure to adequately inform children of the risks of staff-on-resident sex abuse, failure to investigate and report risks of staff-on-resident sex abuse, failure to properly train the staff at the facilities and/or programs, failure to train children about the dangers of sex abuse by facility staff, failure to have an outside agency test their safety procedures, failure to protect the children in its facilities and/or programs from sex abuse, failure to adhere to the applicable standard of care for resident safety, failure to control and prevent its employees, officers, and agents from committing sexual abuse.

571. Upon information and belief, Cook County, its employees, agents, and officers, additionally violated their legal duty by failing to report and/or prevent known and/or suspected sexual abuse of children by Plaintiffs' abusers and/or their other agents to law enforcement.

572. Cook County and its employees, agents, and officers created a foreseeable risk of harm to Plaintiffs. As vulnerable children placed and participating in the facilities and/or programs Cook County offered that were overseen by poorly trained, insufficiently supervised, and inadequately vetted officers and supervisory staff, Plaintiffs were foreseeable victims. Additionally, as vulnerable children whom Plaintiffs' abusers had access to and full control of

through Cook County's facilities and/or programs, Plaintiffs were foreseeable victims. Moreover, Cook County implemented an unconstitutional policy of strip-searching children without a particularized suspicion, which provided a false pretext for sexual abuse.

573. As a direct and proximate result of the above-described conduct, Plaintiffs have suffered, and will continue to suffer, great pain of mind and body, shock, emotional distress, discomfort, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, loss of enjoyment of life, and the loss of normal life. They were prevented, and will continue to be prevented, from performing daily activities and obtaining the full enjoyment of life. They have sustained, and will continue to sustain, loss of earnings and earning capacity. They have incurred, and will continue to incur, expenses for medical and psychological treatment, therapy, and counseling.

COUNT II – *Sexual Abuse*

574. Plaintiffs reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

575. Cook County, by and through its officers, agents, and employees committed childhood sexual abuse and sexual conduct as defined in Illinois Compiled Statute 735 ILCS 5/13-202.2.

576. Sexual abuse of children and adults cause long term physical and psychological harm to the victims including but not limited to unintended pregnancy, post-traumatic stress disorder, disassociation, eating disorders, substance abuse, sexually transmitted infections, sterility, panic and other psychological disorders, inability to form parental and relationship bonds, increased risk of suicide, substance abuse, repeated victimization and other severe and profound effects that alter the course of the lives of the victims.

577. This conduct perpetrated upon Plaintiffs directly and proximately caused, and will continue to cause, in whole or in part, Plaintiffs to suffer great pain of mind and body, shock, emotional distress, discomfort, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, loss of enjoyment of life, and the loss of normal life. They were prevented, and will continue to be prevented, from performing daily activities and obtaining the full enjoyment of life. They have sustained, and will continue to sustain, loss of earnings and earning capacity. They have incurred, and will continue to incur, expenses for medical and psychological treatment, therapy, and counseling.

578. By virtue of the special relationship between Cook County and the Plaintiffs herein, the State of Illinois is vicariously liable for the conduct of its agents, servants, officials, and employees constituting sexual abuse and childhood sexual abuse as defined in Illinois Compiled Statute 735 ILCS 5/13-202.2.

COUNT III – *Assault and Battery*

579. Plaintiffs reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

580. Cook County, by and through its employees acting in the course and scope their employment Cook County, committed intentional, unlawful offers of corporal injury by force, or force unlawfully directed, under such circumstances as to create a well-founded fear of imminent peril or reasonable apprehension of an imminent battery, coupled with the actual and apparent present ability to effectuate that offer, to Plaintiffs. The intentional acts of the employees of Cook County resulted in an offensive contact with the Plaintiffs' person.

581. The assaults and batteries set forth herein were committed by the employees, agents, servants, and/or officials of Cook County in the course and scope of their employment

and/or while upon the premises in possession of the Cook County upon which the abusers were privileged to enter only as servants of Cook County.

582. The assaults and batteries set forth herein perpetrated upon Plaintiffs directly and proximately caused and will continue to cause, in whole or in part, Plaintiffs to suffer great pain of mind and body, shock, emotional distress, discomfort, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, loss of enjoyment of life, and the loss of normal life. They were prevented, and will continue to be prevented, from performing daily activities and obtaining the full enjoyment of life. They have sustained, and will continue to sustain, loss of earnings and earning capacity. They have incurred, and will continue to incur, expenses for medical and psychological treatment, therapy, and counseling.

583. By virtue of the special relationship between Cook County and the Plaintiffs herein, Cook County is vicariously liable for the conduct of its agents, servants, officials, and employees constituting assault and battery.

COUNT IV – *Intentional Infliction of Emotional Distress*

584. Cook County, by and through its employees acting in the course and scope their employment Cook County, and Cook County, by and through its official and unofficial policies, practices, and customs, engaged in outrageous conduct that was so extreme as to go beyond all possible bounds of decency and be regarded as intolerable in a civilized society.

585. Thus, Cook County and its employees, servants, and agents either intended that their conduct should inflict severe emotional distress or knew of and recklessly disregarded a high probability that their conduct would cause severe emotional distress.

586. The extreme and outrageous conduct of Cook County and its employees, servants, and agents actually and proximately caused in whole or in part severe emotional distress of Plaintiffs.

587. In addition to its own acts, conduct set forth herein was committed by the employees, agents, servants, and/or officials of Cook County in the course and scope of their employment and/or while upon the premises in possession of the Cook County upon which the abusers were privileged to enter only as servants of Cook County.

588. By virtue of the special relationship between Cook County and the Plaintiffs herein, Cook County is vicariously liable for the conduct of its agents, servants, officials, and employees constituting extreme and outrageous conduct.

COUNT V - *Negligent Hiring or Retention Against the State of Illinois*

589. Plaintiffs reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

590. Cook County knew or should have known that the Plaintiffs' abusers had a particular unfitness for their respective positions so as to create a danger of harm to the Plaintiffs.

591. The particular unfitness of the employees rendered the Plaintiffs' injuries foreseeable to a person of ordinary prudence in Cook County's position.

592. The particular unfitness of these abusers was known or should have been known at the time Cook County hired or retained them.

593. Cook County breached their duties to Plaintiffs by actively maintaining and employing Plaintiffs' abusers in positions of confidence, trust, power, and authority through which they had access to children, including Plaintiffs.

594. Cook County was negligent in its retention of Plaintiffs' abusers in that they knew, or should have known, through the exercise of ordinary care, that the conduct of Plaintiffs' abusers subjected third parties to an unreasonable risk of harm, including Plaintiffs' abusers' sexual abuse of children in its charge.

595. In failing to timely remove Plaintiffs' abusers from working with children or terminate their employment, the Defendant failed to exercise the degree of care that a reasonably prudent person would have exercised under similar circumstances, which resulted in Plaintiffs' injuries alleged in this action.

596. The particular unfitness of Plaintiffs' abusers and Cook County's various breaches of duties owed to the Plaintiffs directly and proximately caused in whole or in part Plaintiffs to suffer great pain of mind and body, shock, emotional distress, discomfort, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, loss of enjoyment of life, and the loss of normal life. They were prevented, and will continue to be prevented, from performing daily activities and obtaining the full enjoyment of life. They have sustained, and will continue to sustain, loss of earnings and earning capacity. They have incurred, and will continue to incur, expenses for medical and psychological treatment, therapy, and counseling.

COUNT VI – *Negligent Supervision*

597. Plaintiffs reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

598. At all relevant times herein, Cook County had a duty to supervise the Plaintiffs' abusers so as to ensure that those minors in its custody would not be sexually abused.

599. Cook County breached this duty of supervision and negligently supervised the Plaintiffs' abusers.

600. Cook County knew or should have known that both its employees who sexually abused Plaintiffs and its employees who negligently failed to prevent and/or report the sexual abuse behaved in a dangerous or otherwise incompetent manner, and Cook County, having this knowledge, failed to supervise its employees adequately, or take other action to prevent the harm to Plaintiffs.

601. Cook County's negligence proximately caused in whole or in part the Plaintiffs to suffer great pain of mind and body, shock, emotional distress, discomfort, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, loss of enjoyment of life, and the loss of normal life. They were prevented, and will continue to be prevented, from performing daily activities and obtaining the full enjoyment of life. They have sustained, and will continue to sustain, loss of earnings and earning capacity. They have incurred, and will continue to incur, expenses for medical and psychological treatment, therapy, and counseling.

COUNT VII – *Negligent Training*

602. Plaintiffs reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

603. Cook County was at all times responsible for the safety of the children in its custody. Cook County was at all relevant times responsible for creating and enforcing training that ensured the safety of the children in its custody. This duty is non-delegable, and Cook County is vicariously liable for the actions and omissions of their employees and agents in failing to train the abusers of Plaintiffs.

604. Cook County knew or should have known its employees behaved or would behave in a dangerous or otherwise incompetent manner, and having this knowledge, failed to supervise the subject abusers adequately, or take other action to prevent the harm.

605. At all relevant times, Plaintiffs' abusers were employees and/or agents of the Defendant. Plaintiffs' abusers and the Defendant (or Defendant's agents) were therefore in employee-employer relationships. As employees and/or agents of the Defendant, Plaintiffs' abusers were under the direct supervision, management, agency, and control of the Defendant and/or its agent(s) at all relevant times during their interactions with Plaintiffs. Plaintiffs' abusers engaged in the wrongful conduct complained of herein while acting in the course and scope of their employment with the Defendant (or Defendant's agents) and/or perpetrated the sexual abuse by virtue of their job-created authority.

606. At all relevant times, the Defendant had a duty, arising from their (or their agents') employment of Plaintiffs' abusers, to ensure that Plaintiffs' abusers did not sexually abuse children in its custody, including training and supervising them to ensure they did not sexually abuse children in custody. Further, at all relevant times, Defendant had a duty to investigate inappropriate behavior on their part, and to discipline them appropriately, including by terminating their affiliations with the Defendant.

607. The Defendant was negligent in its hiring, training, and supervision of Plaintiffs' abusers in that they knew, or should have known, through the exercise of ordinary care, that the conduct of Plaintiffs' abusers would subject Plaintiffs to an unreasonable risk of harm, including the propensity of Plaintiffs' abusers to sexually abuse children in its charge.

608. Cook County gave Plaintiffs' abusers regular, direct, unsupervised, ongoing access to Plaintiffs and other residents during the course and scope of their duties, when the State knew or should have known that they presented an unreasonable risk of harm to children.

609. Additionally, the Defendant owed a duty to train and educate employees and administrators and establish adequate and effective policies and procedures calculated to detect, prevent, and address sexual abuse of children by JTDC facility staff.

610. The Defendant was negligent in the training and instruction of their agents and employees. The Defendant failed to timely and properly educate and train, supervise, and/or monitor their agents or employees with regard to policies and procedures that should be followed when sexual abuse of a child is suspected or observed.

611. In negligently hiring, training, supervising, and retaining Plaintiffs' abusers, and in failing to establish such training procedures for employees and administrators, the Defendant failed to exercise the degree of care that a reasonably prudent person would have exercised under similar circumstances.

612. It was reasonably foreseeable to the Defendant that their failure to exercise reasonable care would result in sexual abuse of children in its custody, including Plaintiffs.

613. Plaintiffs would not have suffered the foreseeable harm complained of herein but for the Defendant's negligent hiring, training, supervision, and retention of Plaintiffs' abusers and the negligent training and instruction of their other agents and employees.

614. At all relevant times, the Defendant's actions were negligent, willful, wanton, malicious, reckless, grossly negligent, and outrageous in its disregard for Plaintiffs' rights and safety.

615. As a direct and proximate result of the above-described conduct, Plaintiffs have suffered, and will continue to suffer, great pain of mind and body, shock, emotional distress, discomfort, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life. They were prevented, and will continue to be prevented, from performing daily activities and obtaining the full enjoyment of life. They have sustained, and will continue to sustain, loss of earnings and earning capacity. They have incurred, and will continue to incur, expenses for medical and psychological treatment, therapy, and counseling.

COUNT VIII – *Intentional and Negligent Establishment of Policies and Procedures and/or Failure to Follow Establish Policies and Procedures*

616. Plaintiffs reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

617. Upon information and belief, at all relevant times, Defendant had certain policies and procedures in place to investigate concerns, allegations, or complaints regarding employee and agent conduct. Additionally, or in the alternative, Defendant intentionally and/or negligently established policies, practices, or customs that were a moving force of Plaintiffs' injuries set forth herein.

618. Defendant, by and through their authorized agents, servants, and/or employees, officers, and directors, owed a duty to establish policies to benefit Plaintiffs and a duty to follow such policies and procedures as there were for the benefit of Plaintiffs, and breached that duty in one or more of the following ways:

- a. failing to intervene and prevent acts of sexual misconduct by employees and agents;

- b. continuing to allow employees and agents to have unsupervised contact with Plaintiffs in private and semi-private areas of the facilities;
- c. failing to adequately supervise the employees and agents;
- d. failing to protect Plaintiffs from harm;
- e. failing to warn or advise Plaintiffs that certain employees and agents posed a danger to Plaintiffs;
- f. failing to investigate the information, reports, rumors, complaints and allegations concerning certain employees and agents' sexual grooming and/or sexual abuse of Plaintiffs;
- g. attempting to conceal Plaintiffs' sexual abuse at the hands of certain employees and agents;
- h. failing to make mandated reports of suspected child abuse under the Abused and Neglected Child Reporting Act, 325 ILCS 5/3 et seq.;
- i. failing to train employees in the recognition and prevention of sexual grooming and/or sexual abuse;
- j. allowing certain employees and agents to remain employed at Defendant's facilities after learning of the sexual grooming and/or sexual abuse of Plaintiffs;
- k. failing to implement and/or to follow policies and procedures which intended to protect Plaintiffs from abuse by employees and agents of Defendant;
- l. failing to institute policies to prevent unmonitored access to juvenile detainees or instituting policies that caused unmonitored access to juvenile detainees; and/or
- m. implementing policies, such as unconstitutional strip search policies, that were a moving force of the abuse set forth herein.

619. As a direct and proximate result of one or more of the aforementioned negligent, willful and/or wanton acts and/or omissions, Plaintiffs were subjected to sexual abuse and exploitation by employees and agents of Defendant and was caused to suffer the above injuries set forth herein.

DAMAGES AND BILL OF PARTICULARS

620. Plaintiffs reallege and incorporate by reference each and every previous allegation above as if fully stated in this Court.

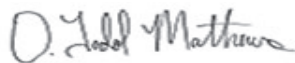
621. Each Plaintiff claims such damages as may be proven at trial, to include, but not necessarily be limited to the following:

- Past, present, and future disability and loss of a normal life;
- Past, present, and future, medical expenses, where applicable;
- Past, present, and future emotional distress;
- Past, present, and future pain and suffering;
- Past, present, and future lost wages and lost wage-earning capacity;
- Pre- and post-judgment interest; and
- All other damages permitted by law.

622. Each Plaintiff herein individually claims and demands judgment in excess of the jurisdictional minimum of this Court.

WHEREFORE, premises considered, Plaintiffs request judgment against the state of Illinois in keeping with the foregoing and such other additional relief to which Plaintiffs may be entitled under law and which the Court deems just, fair, and appropriate under the circumstances.

It is respectfully submitted, this the 23rd day of September, 2024.



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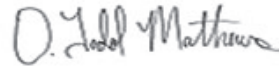
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VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



D. Todd Mathews